

EPA Registration 72500-26



# Receipt for Section 3



S: 997016

Milestone Email: sue@scimetricsltd.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☒ Yes ☐ No

Print Letter

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Enter More Information

Billable: ☐ Yes ☒ No

Tracking

Company: 72500 SCIMETRICS, LTD. CORPORATION



Risk Manager: Registration Division, Risk Management Team 7

Product #: 72500-EA Product Name: KAPUT FERAL HOG BAIT

Override#:

Me Too

Me Too Product

☐ Section3:

Name:

Application Date: 30-Dec-2016



OPP Rec'd Date: 30-Dec-2016



Front End Date: 30-Dec-2016



Risk Manager Send Date: 30-Dec-2016



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Portal submission pkg# 16424. Submission of revised csfs as requested by the Agency

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

De

CSF

View/Edit

NEED TO BE REVIEWED AND

FILED JACET

DOCUMENT



December 30, 2016

Mr. Mark Suarez, Product Manager 7  
Document Processing Desk - *Notif*  
Office of Pesticide Programs - 7504P  
**U.S. Environmental Protection Agency**  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, VA 22202

Dear Mr. Suarez:

**Subject:** NOTIFICATION: Kaput® HOG-GONE Name Change to Kaput® FERAL HOG BAIT  
EPA File Symbol 72500-EA

The following documents are re-submitted pertaining to subject product FIFRA Section (3)(c) pesticide product registration:

1. Confidential Statement of Formula - Basic
2. Confidential Statement of Formula - Alternate
3. Data Matrix (Agency Internal Use Copy)
4. Data Matrix (Public File Copy)

The name on above listed documents was changed to Kaput® FERAL HOG BAIT based on the Agency's request. The Agency informed Scimetrics Ltd. Corp. that "Hog-Gone" was already trademarked by a different company, and therefore could not be used for this application.

Please contact me at (970) 482-1330 or [sue@scimetricsltd.com](mailto:sue@scimetricsltd.com) if you have any questions or require additional information.



Sincerely,

  
Sue Valentine,  
Regulatory Manager

DOCUMENT



PO Box 1045 • Wellington, Colorado 80549-1045  
970-482-1330 Phone • 970-482-1885 Fax  
[www.kaputproducts.com](http://www.kaputproducts.com)

	United States <b>Environmental Protection Agency</b> 401 M Street, S.W. Washington, DC 20460-0001	<input type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input checked="" type="checkbox"/> <b>Other</b>	OPP Identifier Number  <b>Notification</b>
	<b>Application for Pesticide – Section I</b>		
1. Company/Product Number <b>EPA File Symbol 72500-EA</b>		2. EPA Product Manager <b>Mark Suarez</b>	
4. Company/ Product (Name) <b>Kaput® FERAL HOG BAIT</b>		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) <b>Scimetrix Ltd. Corp.</b> <b>PO Box 1045</b> <b>Wellington CO 80549</b> <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to:  EPA Reg. No. _____ Product Name: _____	
<b>Section – II</b>			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.	
<b>Explanation:</b> Use additional page(s) if necessary. (For Section I and Section II.)  <b>We are re-submitting Confidential Statement of Formula (Basic and Alternate) and Data Matrix (Agency and Public Copy) to reflect the correct name of Kaput® FERAL HOG BAIT. The original name of "Kaput Hog-Gone" had to be changed per Agency's request. The Agency already had the name "Hog-Gone" on file by a different company.</b>  <i>This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR § 152.46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.</i>			
<b>Section – III</b>			
<b>1. Material This Product Will Be Packaged In:</b>			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
<b>*Certification must be submitted</b>		If "Yes" Unit Packaging Wgt.    No. Per Container _____    _____	If "Yes" Packaging Wgt.    No. Per Container _____    _____
3. Location of Net Contents Information  <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container  <b>25 to 100 lbs.</b>	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Other Self-adhesive; printed _____			
<b>Section - IV</b>			
<b>1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)</b>			
Name Sue Valentine		Title Regulatory Manager	
		Telephone No. (Include Area Code) 970-482-1330	
<b>Certification</b>			6. Date Application Received <b>(Stamped)</b>
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Regulatory Manager	
4. Typed Name Sue Valentine		5. Date December 30, 2016	



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration  
(under FIFRA, as amended)

EPA Reg. Number:

72500-26

Date of Issuance:

1/3/17

Term of Issuance:

Conditional

Name of Pesticide Product:

KAPUT® FERAL HOG BAIT

Name and Address of Registrant (include ZIP Code):

Ms. Sue Valentine  
Regulatory Manager  
Scimetrix Ltd., Corp.  
P.O. Box 1045  
Wellington, CO 80549-1045

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Venus Eagle, Acting Chief  
Invertebrate-Vertebrate Branch 3, Registration Division (7505P)

Date:

1/3/17

2. Be aware that proposed data requirements have been identified in a Preliminary Work Plan. For more information on these proposed data requirements, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:  
<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>
3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
4. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, "EPA Reg. No. 72500-26."
5. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 12/30/2016
- Alternate CSF 1 dated 12/30/2016

If you have any questions, please contact Mark Suarez by phone at 703-305-0120, or via email at [suarez.mark@epa.gov](mailto:suarez.mark@epa.gov).

Enclosure

# Kaput® FERAL HOG BAIT

## Active Ingredient:

Warfarin (CAS Number 81-81-2) .....	0.005%
Other Ingredients .....	99.995%
Total .....	100.000%

Keep Out of Reach of Children

## CAUTION

See back [side] panel for First Aid and Precautionary Statements.

EPA Reg. No. 72500-  
EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs  
{25 to 100 lbs}  
{11.34 to 45.36 kg}

{Back [Side] Panel}

FIRST AID	
<b>If Swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If in Eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
TREATMENT FOR PET POISONING	
If animal eats bait, call veterinarian at once.	
NOTE TO PHYSICIAN OR VETERINARIAN	
Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K <sub>1</sub> , intramuscularly or orally.	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.	

**ACCEPTED**

**01/03/2017**

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 72500-26

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

### Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks, and
- When handling bait or retrieving animal carcasses, chemical-resistant gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

## USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.

## ENVIRONMENTAL HAZARDS

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### READ THIS LABEL:

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label.
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only be used to control feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands. This bait may only be applied in hog feeders equipped with heavy lids (8 to 10 lbs. of total weight) on bait compartments so as to limit direct access to bait by nontarget animals. Feral hogs must be conditioned to accept feed from the bait dispensers and to open the weighted lids to bait compartments.

- Do not apply this bait directly on the ground, including all types of ground surface (e.g., bare or plant-covered ground, paved surfaces, etc.). Apply this product only in hog feeders consistent with the description provided above.
- Apply bait in fenced areas, if available.
- When handling bait or animal carcasses, wear protective gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).
- Store this product out of reach of children, pets, domesticated animals, and wildlife.
- Post bilingual caution signs (English and Spanish) in the treated areas to warn the public of the presence of the Warfarin bait and to forbid disturbance of bait dispensers and hog carcasses. Post these signs on public roads, trails, and pathways within and at common points of access to treated areas.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (whether fenced or open) during the baiting program. If bait is to be applied in areas used for grazing, ensure that all livestock are removed and excluded from baited areas before applying this product and for at least 90 days after toxic baits are removed from bait dispensers.

**SELECTION OF BAITING SITES:** Baiting sites must be consistent with the limitations set forth in the **USE RESTRICTIONS** on this label (above). Before applying this product, observe the area selected for treatment to identify where hog activity and trails are located. Look for evidence of recent activity, including hog sightings, hog damage to crops, rooting of the soil, hog wallows, and fresh hog tracks and fecal material.

**PLACING AND SECURING HOG FEEDERS:** Locate hog feeders in or near probable resting areas for hogs, including brush along streams, dense cover, and tall vegetation. Do not place feeders in open areas in crops, fields, or pastures. From one to three bait feeders may be used per placement location, according to the apparent number of hogs visiting the location. Three dispensers spaced no more than 10 feet apart may be used where hog numbers are excessive (e.g., if large hog family groups, or sounders, are present). Secure feeders in place, so that hogs cannot tip them over, by use of T-posts or by tying the feeders to trees or shrubs.

**CONDITIONING HOGS TO FEEDERS:** After the feeders are situated and secured, feral hogs must be conditioned (trained) to feed from them. To accomplish this, load the feeding compartments with a non-toxic feed, and open the lids to the feeding compartments by about 6 inches so that hogs can access this feed with little difficulty. To condition hogs to accept this product, use one of the following preparations as the non-toxic feed: (1) cracked or whole corn, soaked in water for 3-5 days until it has a noticeable odor; (2) cracked or whole corn treated with a commercially available hog attractant which includes scents of hog urine, fruit, or pet food; or (3) Kaput Feral Hog Lure. Load 25 to 50 lbs. of the non-toxic feed into each hog feeder. Provide access to non-toxic feed for three to six weeks, until hogs are feeding readily from the bait compartments. Failure to condition hogs to feeders or ending the conditioning period too early may reduce the number of hogs taken or prolong the period of time needed for toxic baiting.

**BAIT APPLICATION:** After feral hogs have been conditioned to take non-toxic feed from bait compartments, remove all of the non-toxic feed remaining in the feeders. Add 25 to 50 lbs. of *Kaput*® FERAL HOG BAIT to each feeder and **close lids to bait compartments** so that hogs must lift the doors with their snouts in order to access bait. (Do not load this product into feeders from which no non-toxic bait was consumed during the conditioning period.) Monitor feeders every 1 to 4 days once treatment has begun to determine whether hogs are accessing bait, to assess whether bait is being spilled around feeders, and to replenish bait, if appropriate. Refill feeders if bait is significantly depleted or degraded, and there still is evidence of hog activity at the feeder. As bait take and hog numbers decline, the feeders may be monitored at 5-day intervals, but site surveillance must continue as described below. If possible, feeders should be checked at mid-day to minimize disturbance to feral hogs. Bait spilled around feeders must be collected and disposed of properly.

**SURVEILLANCE AND FOLLOW-UP:** Dead hogs may begin to appear in or near the treatment areas within 4 to 7 days after bait placement. Applicators must return to the treatment site within 4 days after the first bait placements were made, and at 2- to 4-day intervals thereafter, to inspect the site for evidence of dead or dying feral hogs and/or dead nontarget animals. All carcasses found must be disposed of properly. Carcasses may be buried on site in

holes dug deeply enough that the entire carcass is at least 18 inches below the ground surface. Cover buried carcasses up to the level of the surrounding ground. If burial is not practical (e.g., due to frozen or extremely hard ground) and other disposal methods are allowed by State and local authorities, carcasses may be disposed of by other methods to ensure that carcasses are not accessible to scavengers. Continue to monitor the treatment area to collect and dispose of feral hogs and to search for non-target animals for at least two weeks after the removal of all bait from the hog feeders. Deaths of any animals other than feral hogs that appear to be the result of baiting with this product must be reported to State authorities.

**Note:** A dye in this product will impart a blue color to the fatty tissues of hogs that have eaten the bait.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. Offer container for recycling, if available, or reconditioning, if appropriate. Otherwise, dispose of empty container in a sanitary landfill.

Batch Code [Lot Number]: {Description of where lot number is located}

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

#### WARRANTY

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

#### [WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

#### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THE NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

**If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded. By using the goods, you expressly agree to all of the terms and conditions of this contract.]**

[Attention [Notice]: This product contains a chemical known to the state of California to cause birth defects or other reproductive harm.]

Manufactured by:

**Scimetrics**  
LTD. CORP.

**[Pest Management Solutions]**

P.O. Box 1045

Wellington, CO 80549

(970) 482-1330

[customerservice@kaputproducts.com](mailto:customerservice@kaputproducts.com)

Made in [the] U.S.A. [USA]

[Patent Pending]

[Kaput® is a registered trademark of Scimetrics Ltd. Corporation]

{ } Denotes language that does not appear on the market label

[ ] Denotes alternate/optional language

## **CAUTION**

- Warfarin bait to control feral hogs is being used in this area.
- Do not touch dead animals or bait dispensers.
- Do not eat meat from animals shot or found dead in this area.
- Do not eat animals with internal parts that are dyed blue.
- Do not allow livestock to graze in this area.

## **PRECAUCIÓN**

- Cebo con warfarin se utiliza en esta área para controlar marrano salvajes.
- No toque animales muertos ni dispensadores de cebo.
- No coma carne de animales disparados o encontrados muertos en esta zona.
- No coma animales con partes internas teñidas azul.
- En esta zona no permita ganado a pacer.

## Jacobs, William

---

**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Friday, December 02, 2016 3:46 PM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Re: EPA File Symbol 72500-EA  
**Attachments:** 72500-EA Kaput Feral Hog Bait Proposed Label 12.02.16.docx; 72500-EA-Warning Sign-Kaput Feral Hog Bait 12.02.16.docx

5995900

Bill:

See attached. Let me know if that is good to go, and if you need me to

On Fri, Dec 2, 2016 at 12:49 PM, Jacobs, William <Jacobs.Bill@epa.gov>

Sorry for the confusion. The "Suggested Text for Warning Signs" is not sup

Resubmission pending  
PA letter +  
label were  
forwarded on  
12/14/16

All that should go on the label is the bulleted statement under "USE RESTRICTIONS" required and the signs must include certain information. The suggested text information that is to be included on the signs and used as the starting point in case they want to add text that is appropriate for State laws, but not con

The signs, as posted, should have big print and ample line spacing so that they are readily noticed and easily read.

Please resubmit the label with the "Suggested Text for Warning Signs" text deleted but returned as a separate document.

**From:** sue@kaputproducts.com [mailto:sue@kaputproducts.com] On Behalf Of Sue Valentine  
**Sent:** Friday, December 02, 2016 2:15 PM  
**To:** Jacobs, William <Jacobs.Bill@epa.gov>  
**Cc:** richard@genesislabs.com  
**Subject:** Re: EPA File Symbol 72500-EA

Bill:

Please see updated label verbiage including the corrections listed with your email 12.02.2016. I inserted "Suggested Text for Warning Signs" after the last paragraph of "Use Restrictions".

Can we condense the layout of this box a little, for example, reduce spacing between the individual lines?

I also had a question regarding the name change from "Hog-Gone" to "Kaput reral Hog Bait": Do I need to email you any updated forms, e.g., an updated CSF showing the new name "Kaput Feral Hog Bait"?

Let me know. Thanks, and have a good week-end, Sue.

On Thu, Dec 1, 2016 at 11:16 AM, Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)> wrote:

From my perspective, we are very close on the label for this product and on the content of "generic" posting signs. See attachments.

You might find that some States will want to add text to the generic sign to address State-specific issues (e.g., hunting seasons).

--

Sue Valentine

Scimetrix Ltd. Corp.

PO Box 1045

Wellington, CO 80549

Ph. 970-482-1330

--

Sue Valentine

Scimetrix Ltd. Corp.

PO Box 1045

Wellington, CO 80549

Ph. 970-482-1330

**RESTRICTED USE PESTICIDE**

**DUE TO HAZARDS TO NONTARGET ORGANISMS**

For retail sale only to and use only by Certified Applicators, or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

## Kaput® FERAL HOG BAIT

**Active Ingredient:**

Warfarin (CAS Number 81-81-2) .....	0.005%
<b>Other Ingredients</b> .....	<u>99.995%</u>
<b>Total</b> .....	100.000%

**Keep Out of Reach of Children**

**CAUTION**

See back [side] panel for First Aid and Precautionary Statements.

EPA Reg. No. 72500-  
EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs  
{25 to 100 lbs}  
[{11.34 to 45.36 kg}]

{Back [Side] Panel}

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

**If swallowed**, immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If in eyes**, hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian at once.

**NOTE TO PHYSICIAN OR VETERINARIAN**

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally.

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks, and
- When handling bait or retrieving animal carcasses, chemical-resistant gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

#### Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.

### ENVIRONMENTAL HAZARDS

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

### ENDANGERED SPECIES PROTECTION REQUIREMENTS

This product may have effects on endangered species. When using this product you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### READ THIS LABEL:

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label.
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only be used to control feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands. This bait may only be applied in hog feeders equipped with heavy lids (8 to 10 lbs. of total weight) on bait compartments so as to limit direct access to bait by nontarget animals. Feral hogs must be conditioned to accept feed from the bait dispensers and to open the weighted lids to bait compartments.

- Do not apply this bait directly on the ground, including all types of ground surface (e.g., bare or plant-covered ground, paved surfaces, etc.). Apply this product only in hog feeders consistent with the description provided above.
- Apply bait in fenced areas, if available.
- When handling bait or animal carcasses, wear protective gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).
- Store this product out of reach of children, pets, domesticated animals, and wildlife.
- Post bilingual caution signs (English and Spanish) in the treated areas to warn the public of the presence of the Warfarin bait and to forbid disturbance of bait dispensers and hog carcasses. Post these signs on public roads, trails, and pathways within and at common points of access to treated areas.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (whether fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers. If bait is to be applied in areas used for grazing, ensure that all livestock are removed and excluded from those areas before applying this product.

**SELECTION OF BAITING SITES:** Baiting sites must be consistent with the limitations set forth in the **USE RESTRICTIONS** on this label (above). Before applying this product, observe the area selected for treatment to identify where hog activity and trails are located. Look for evidence of recent activity, including hog sightings, hog damage to crops, rooting of the soil, hog wallows, and fresh hog tracks and fecal material.

**PLACING AND SECURING HOG FEEDERS:** Locate hog feeders in or near probable resting areas for hogs, including brush along streams, dense cover, and tall vegetation. Do not place feeders in open areas in crops, fields, or pastures. From one to three bait feeders may be used per placement location, according to the apparent number of hogs visiting the location. Three dispensers spaced no more than 10 feet apart may be used where hog numbers are excessive (e.g., if large hog family groups, or sounders, are present). Secure feeders in place, so that hogs cannot tip them over, by use of T-posts or by tying the feeders to trees or shrubs.

**CONDITIONING HOGS TO FEEDERS:** After the feeders are situated and secured, feral hogs must be conditioned (trained) to feed from them. To accomplish this, load the feeding compartments with a non-toxic feed, and open the lids to the feeding compartments by about 6 inches so that hogs can access this feed with little difficulty. To condition hogs to accept this product, use one of the following preparations as the non-toxic feed: (1) cracked or whole corn, soaked in water for 3-5 days until it has a noticeable odor; (2) cracked or whole corn treated with a commercially available hog attractant which includes scents of hog urine, fruit, or pet food; or (3) Kaput Feral Hog Lure. Load 25 to 50 lbs. of the non-toxic feed into each hog feeder. Provide access to non-toxic feed for three to six weeks, until hogs are feeding readily from the bait compartments. Failure to condition hogs to feeders or ending the conditioning period too early may reduce the number of hogs taken or prolong the period of time needed for toxic baiting.

**BAIT APPLICATION:** After feral hogs have been conditioned to take non-toxic feed from bait compartments, remove all of the non-toxic feed remaining in the feeders. Add 25 to 50 lbs. of *Kaput® FERAL HOG BAIT* to each feeder and **close lids to bait compartments** so that hogs must lift the doors with their snouts in order to access bait. (Do not load this product into feeders from which no non-toxic bait was consumed during the conditioning period.) Monitor feeders every 1 to 4 days once treatment has begun to determine whether hogs are accessing bait, to assess whether bait is being spilled around feeders, and to replenish bait, if appropriate. Refill feeders if bait is significantly depleted or degraded, and there still is evidence of hog activity at the feeder. As bait take and hog numbers decline, the feeders may be monitored at 5-day intervals, but site surveillance must continue as described

below. If possible, feeders should be checked at mid-day to minimize disturbance to feral hogs. Bait spilled around feeders must be collected and disposed of properly.

**SURVEILLANCE AND FOLLOW-UP:** Dead hogs may begin to appear in or near the treatment areas within 4 to 7 days after bait placement. Applicators must return to the treatment site within 4 days after the first bait placements were made, and at 2- to 4-day intervals thereafter, to inspect the site for evidence of dead or dying feral hogs and/or dead nontarget animals. All carcasses found must be disposed of properly. Carcasses may be buried on site in holes dug deeply enough that the entire carcass is at least 18 inches below the ground surface. Cover buried carcasses up to the level of the surrounding ground. If burial is not practical (e.g., due to frozen or extremely hard ground) and other disposal methods are allowed by State and local authorities, carcasses may be disposed of by other methods to ensure that carcasses are not accessible to scavengers. Continue to monitor the treatment area to collect and dispose of feral hogs and to search for non-target animals for at least two weeks after the removal of all bait from the hog feeders. Deaths of any animals other than feral hogs that appear to be the result of baiting with this product must be reported to State authorities.

**Note:** A dye in this product will impart a blue color to the fatty tissues of hogs and other animals that have eaten the bait.

#### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. Offer container for recycling, if available, or reconditioning, if appropriate. Otherwise, dispose of empty container in a sanitary landfill.

Batch Code [Lot Number]: {Description of where lot number is located}

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

#### **WARRANTY**

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

#### **[WARRANTY DISCLAIMER**

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE

GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

#### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THE NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

**If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded. By using the goods, you expressly agree to all of the terms and conditions of this contract.]**

[Attention [Notice]: This product contains a chemical known to the state of California to cause birth defects or other reproductive harm.]

Manufactured by:

**Scimetrics**  
LTD. CORP.

**[Pest Management Solutions]**

P.O. Box 1045

Wellington, CO 80549

(970) 482-1330

[customerservice@kaputproducts.com](mailto:customerservice@kaputproducts.com)

Made in [the] U.S.A. [USA]

**[Kaput® is a registered trademark of Scimetrics Ltd. Corporation]**

**{ } Denotes language that does not appear on the market label**

**[ ] Denotes alternate/optional language**

Suggested text for warning signs

## **CAUTION**

- Warfarin bait to control feral hogs is being used in this area.
- Do not touch dead animals or bait dispensers.
- Do not eat meat from animals shot or found dead in this area.
- Do not eat animals with internal parts that are dyed blue.
- Do not allow livestock to graze in this area.

## **PRECAUCIÓN**

- Cebo con warfarin se utiliza en esta área para controlar marrano salvajes.
- No toque animales muertos ni dispensadores de cebo.
- No comer carne de animales disparados o encontrados muertos en esta zona.
- No coma animales con partes internas teñidas azul.
- En esta zona no permita ganado a pacer.

## Jacobs, William

---

**From:** Jacobs, William  
**Sent:** Friday, December 02, 2016 2:50 PM  
**To:** 'Sue Valentine'  
**Subject:** RE: EPA File Symbol 72500-EA

S995909  
R230/1135

Sorry for the confusion. The **"Suggested Text for Warning Signs"** is not supposed to go in the product's label itself.

All that should go on the label is the bulleted statement under **"USE RESTRICTIONS:"** to the effect that site-posting is required and the signs must include certain information. The suggested text for signs provides a minimum set of information that is to be included on the signs and used as the starting point for interactions with State lead agencies in case they want to add text that is appropriate for State laws, but not contradictory to Federal requirements.

The signs, as posted, should have big print and ample line spacing so that they are readily noticed and easily read.

Please resubmit the label with the **"Suggested Text for Warning Signs"** text deleted but returned as a separate document.

**From:** sue@kaputproducts.com [mailto:sue@kaputproducts.com] **On Behalf Of** Sue Valentine  
**Sent:** Friday, December 02, 2016 2:15 PM  
**To:** Jacobs, William <Jacobs.Bill@epa.gov>  
**Cc:** richard@genesislabs.com  
**Subject:** Re: EPA File Symbol 72500-EA

Bill:

Please see updated label verbiage including the corrections listed with your email 12.02.2016. I inserted "Suggested Text for Warning Signs" after the last paragraph of "Use Restrictions".

Can we condense the layout of this box a little, for example, reduce spacing between the individual lines?

I also had a question regarding the name change from "Hog-Gone" to "Kaput Feral Hog Bait": Do I need to email you any updated forms, e.g., an updated CSF showing the new name "Kaput Feral Hog Bait"?

Let me know. Thanks, and have a good week-end, Sue.

On Thu, Dec 1, 2016 at 11:16 AM, Jacobs, William <Jacobs.Bill@epa.gov> wrote:

From my perspective, we are very close on the label for this product and on the content of "generic" posting signs. See attachments.

You might find that some States will want to add text to the generic sign to address State-specific issues (e.g., hunting seasons).

--  
Sue Valentine  
Scimetrix Ltd. Corp.  
PO Box 1045

Wellington, CO 80549  
Ph. 970-482-1330

**Jacobs, William**

---

**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Friday, December 02, 2016 2:15 PM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Re: EPA File Symbol 72500-EA  
**Attachments:** 72500-EA Kaput Feral Hog Bait Proposed Label 12.02.16.docx

Bill:

Please see updated label verbiage including the corrections listed with your email 12.02.2016. I inserted "Suggested Text for Warning Signs" after the last paragraph of "Use Restrictions".

Can we condense the layout of this box a little, for example, reduce spacing between the individual lines?

I also had a question regarding the name change from "Hog-Gone" to "Kaput Feral Hog Bait": Do I need to email you any updated forms, e.g., an updated CSF showing the new name "Kaput Feral Hog Bait"?

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Ph. 970-482-1330

**RESTRICTED USE PESTICIDE**

**DUE TO HAZARDS TO NONTARGET ORGANISMS**

For retail sale only to and use only by Certified Applicators, or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

## Kaput® FERAL HOG BAIT

**Active Ingredient:**

Warfarin (CAS Number 81-81-2) ..... 0.005%

**Other Ingredients** ..... 99.995%

**Total** ..... 100.000%

**Keep Out of Reach of Children**

**CAUTION**

See back [side] panel for First Aid and Precautionary Statements.

EPA Reg. No. 72500-  
EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs  
{25 to 100 lbs}  
[{11.34 to 45.36 kg}]

{Back [Side] Panel}

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

**If swallowed**, immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If in eyes**, hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian at once.

**NOTE TO PHYSICIAN OR VETERINARIAN**

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally.

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks, and
- When handling bait or retrieving animal carcasses, chemical-resistant gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.

### ENVIRONMENTAL HAZARDS

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

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### DIRECTIONS FOR USE

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- Do not apply this bait directly on the ground, including all types of ground surface (e.g., bare or plant-covered ground, paved surfaces, etc.). Apply this product only in hog feeders consistent with the description provided above.
- Apply bait in fenced areas, if available.
- When handling bait or animal carcasses, wear protective gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).
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- Post bilingual caution signs (English and Spanish) in the treated areas to warn the public of the presence of the Warfarin bait and to forbid disturbance of bait dispensers and hog carcasses. Post these signs on public roads, trails, and pathways within and at common points of access to treated areas.

#### **Suggested Text for Warning Signs**

### **CAUTION**

- Warfarin bait to control feral hogs is being used in this area.
- Do not touch dead animals or bait dispensers.
- Do not eat meat from animals shot or found dead in this area.
- Do not eat animals with internal parts that are dyed blue.
- Do not allow livestock to graze in this area.

### **PRECAUCIÓN**

- Cebo con warfarin se utiliza en esta área para controlar marrano salvajes.
- No toque animales muertos ni dispensadores de cebo.
- No comer carne de animales disparados o encontrados muertos en esta zona.
- No coma animales con partes internas teñidas azul.
- En esta zona no permita ganado a pacer.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (whether fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers. If bait is to be applied in areas used for grazing, ensure that all livestock are removed and excluded from those areas before applying this product.

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**PLACING AND SECURING HOG FEEDERS:** Locate hog feeders in or near probable resting areas for hogs, including brush along streams, dense cover, and tall vegetation. Do not place feeders in open areas in crops, fields, or pastures. From one to three bait feeders may be used per placement location, according to the apparent number of hogs visiting the location. Three dispensers spaced no more than 10 feet apart may be used where hog numbers are excessive (e.g., if large hog family groups, or sounders, are present). Secure feeders in place, so that hogs cannot tip them over, by use of T-posts or by tying the feeders to trees or shrubs.

**CONDITIONING HOGS TO FEEDERS:** After the feeders are situated and secured, feral hogs must be conditioned (trained) to feed from them. To accomplish this, load the feeding compartments with a non-toxic feed, and open the lids to the feeding compartments by about 6 inches so that hogs can access this feed with little difficulty. To condition hogs to accept this product, use one of the following preparations as the non-toxic feed: (1) cracked or whole corn, soaked in water for 3-5 days until it has a noticeable odor; (2) cracked or whole corn treated with a commercially available hog attractant which includes scents of hog urine, fruit, or pet food; or (3) Kaput Feral Hog Lure. Load 25 to 50 lbs. of the non-toxic feed into each hog feeder. Provide access to non-toxic feed for three to six weeks, until hogs are feeding readily from the bait compartments. Failure to condition hogs to feeders or ending the conditioning period too early may reduce the number of hogs taken or prolong the period of time needed for toxic baiting.

**BAIT APPLICATION:** After feral hogs have been conditioned to take non-toxic feed from bait compartments, remove all of the non-toxic feed remaining in the feeders. Add 25 to 50 lbs. of *Kaput*® FERAL HOG BAIT to each feeder and **close lids to bait compartments** so that hogs must lift the doors with their snouts in order to access bait. (Do not load this product into feeders from which no non-toxic bait was consumed during the conditioning period.) Monitor feeders every 1 to 4 days once treatment has begun to determine whether hogs are accessing bait, to assess whether bait is being spilled around feeders, and to replenish bait, if appropriate. Refill feeders if bait is significantly depleted or degraded, and there still is evidence of hog activity at the feeder. As bait take and hog numbers decline, the feeders may be monitored at 5-day intervals, but site surveillance must continue as described below. If possible, feeders should be checked at mid-day to minimize disturbance to feral hogs. Bait spilled around feeders must be collected and disposed of properly.

**SURVEILLANCE AND FOLLOW-UP:** Dead hogs may begin to appear in or near the treatment areas within 4 to 7 days after bait placement. Applicators must return to the treatment site within 4 days after the first bait placements were made, and at 2- to 4-day intervals thereafter, to inspect the site for evidence of dead or dying feral hogs and/or dead nontarget animals. All carcasses found must be disposed of properly. Carcasses may be buried on site in holes dug deeply enough that the entire carcass is at least 18 inches below the ground surface. Cover buried carcasses up to the level of the surrounding ground. If burial is not practical (e.g., due to frozen or extremely hard ground) and other disposal methods are allowed by State and local authorities, carcasses may be disposed of by other methods to ensure that carcasses are not accessible to scavengers. Continue to monitor the treatment area to collect and dispose of feral hogs and to search for non-target animals for at least two weeks after the removal of all bait from the hog feeders. Deaths of any animals other than feral hogs that appear to be the result of baiting with this product must be reported to State authorities.

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### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. Offer container for recycling, if available, or reconditioning, if appropriate. Otherwise, dispose of empty container in a sanitary landfill.

Batch Code [Lot Number]: {Description of where lot number is located}

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

### WARRANTY

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

### [WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THE NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

**If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded. By using the goods, you expressly agree to all of the terms and conditions of this contract.]**

[Attention [Notice]: This product contains a chemical known to the state of California to cause birth defects or other reproductive harm.]

Manufactured by:

**Scimetrics**  
LTD. CORP.

**[Pest Management Solutions]**

P.O. Box 1045

Wellington, CO 80549

(970) 482-1330

[customerservice@kaputproducts.com](mailto:customerservice@kaputproducts.com)

Made in [the] U.S.A. [USA]

**[Kaput® is a registered trademark of Scimetrics Ltd. Corporation]**

**{ } Denotes language that does not appear on the market label**

**[ ] Denotes alternate/optional language**

## Jacobs, William

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**From:** Jacobs, William  
**Sent:** Thursday, December 01, 2016 1:16 PM  
**To:** 'Sue Valentine'  
**Subject:** EPA File Symbol 72500-EA  
**Attachments:** 72500-EA-Label Comments-20161201-WWJ.docx; 72500-EA-Warning Sign-WWJ Revisions-20161201.docx

S995394  
R230/1135

From my perspective, we are very close on the label for this product and on the content of "generic" posting signs. See attachments.

You might find that some States will want to add text to the generic sign to address State-specific issues (e.g., hunting seasons).

Compare Docs  
wouldn't  
print on 11/30/16  
Put 11/23/16 Label  
under the submit  
(rather than 8/18/16  
label)

The revisions enumerated below are needed for the label submitted for this product on November, 23, 2016.

1. In the **“DIRECTIONS FOR USE”** section (page 2), there are minor grammatical issues with the items listed under **“IMPORTANT:”**. The easiest “fix” would be to change “label; and” in item “2.” to “label.” With that change, the numbered list would consist of three separate sentences rather than one long sentence beginning with “To help prevent accidents:”. Alternatively, the text may be worded and punctuated as indicated in our comments from November 22.
2. In the last sentence of the **“PLACING AND SECURING HOG FEEDERS:”** paragraph (page 3), change “tip over” to “tip them over”.
3. In the third sentence of the **“CONDITIONING HOGS TO FEEDERS:”** paragraph, change “as to non-toxic feed” to “as the non-toxic feed”.
4. In the **“STORAGE AND DISPOSAL”** box (page 4), the **“Container Handling:”** text should appear in its own paragraph, set apart from the **“Pesticide Disposal:”** text. The content of the **“Container Handling:”** paragraph should be revised to read and appear as shown immediately below.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. Offer container for recycling, if available, or reconditioning, if appropriate. Otherwise, dispose of empty container in a sanitary landfill.

5. In first sentence of the **“LIMITATIONS OF LIABILITY”** paragraph on page 5, check to determine whether “IN THEIR NATURE” was intended to be “IN THE NATURE”.

Suggested text for warning signs

## **CAUTION**

- Warfarin bait to control feral hogs is being used in this area.
- Do not touch dead animals or bait dispensers.
- Do not eat meat from animals shot or found dead in this area.
- Do not eat animals with internal parts that are dyed blue.
- Do not allow livestock to graze in this area.

## **PRECAUCIÓN**

- Cebo con warfarin se utiliza en esta área para controlar marrano salvajes.
- No toque animales muertos ni dispensadores de cebo.
- No comer carne de animales disparados o encontrados muertos en esta zona.
- No coma animales con partes internas teñidas azul.
- En esta zona no permita ganado a pacer.

## Jacobs, William

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**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Wednesday, November 23, 2016 2:01 PM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17  
**Attachments:** 72500-EA Kaput Feral Hog Bait DRAFT LABEL 11.23.16.docx; Recommended Language for Warning Sign.docx

S995394

Bill:

Attached is the updated label per your email dated 11.22.16. We did like your write up, and went with it except for a couple of minor changes:

1. Under Use Restrictions, last paragraph, I changed to sentence to start with: "Post bilingual caution signs (English and Spanish)...."
2. Under Conditioning Hogs to Feeder, approx. middle of paragraph, I changed "..., use one of the following preparations as the non-toxic feed:" to "...,use one of the following preparations as to non-toxic feed."

Other comments regarding your suggestions:

1. We are going with your recommendation regarding commercial feeders and HogStopper, and leave it out of the verbiage.
2. Regarding your suggestion on closing lids near the end of the conditioning period: we have done several studies that showed hogs had no problems opening the lid on the first day of actual (toxic) baiting, so we are leaving the Conditioning Hog Section as is, with lid open about 6 inches until the end of conditioning period.
3. Since we are listing under Use Restrictions to post warning signs, we could add a box that shows recommended verbiage. See example attached. Let us know if you want to add this to the label, after the last paragraph of Use Restrictions and before Grazing Restrictions.

Bill, after you had a chance to look at the updated draft label, let us know if anything else comes to mind. We will do the same at our end, and like I said, hopefully finalize it no later than next week. With best regards, Sue.

On Wed, Nov 23, 2016 at 7:51 AM, Sue Valentine <sue@scimetricsltd.com> wrote:

Bill:

This is to confirm the receipt of your email and Feral Hog draft label. Looks pretty good! We are working on these changes and are planning to email an updated version back to you today. Then we can work on the fine-tuning and hopefully finalize it by next week. Thanks again for your help! Sue.

On Tue, Nov 22, 2016 at 1:55 PM, Jacobs, William <Jacobs.Bill@epa.gov> wrote:

I have read through your suggestions from November 15 and have taken a stab at amending the **DIRECTIONS FOR USE** section as well as other areas of the pending label (submitted on August 18, 2016). I also have considered site-posting requirements. See attachment.

We will need an amended label incorporating text pertaining to conditioning and classification pretty soon if this action is to stay on schedule/

**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [mailto:[sue@kaputproducts.com](mailto:sue@kaputproducts.com)] **On Behalf Of** Sue Valentine  
**Sent:** Tuesday, November 15, 2016 10:10 AM

**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Bill:

Thanks for your comments:

1. We agree the label should be Restricted Use Pesticide, that is the safe approach even with the low concentration of warfarin.

2. We are also in agreement with you that the label has to have more comprehensive Directions for Use instructions, and would like for you to do an initial write up of those directions. We have given it some thought as well, and have following suggestions:

**"SELECTION OF BAITING SITES:** Choose areas to bait that are in probable resting areas for hogs, such as brush along streams, dense cover, and tall vegetation. Look for signs of feral hogs such as tracks, visual sightings, fecal material, rooting, wallows, and crop damage. Do not place feeders in crops, open fields, or areas where livestock is kept. Remove livestock before baiting if you use in cattle grazing lands. If hog numbers are excessive, place 3 feeders within 10 feet apart. Secure feeders with T-posts, tying to trees or shrubs to ensure hogs do not tip feeders over and expose other animals to the feed or bait."

**"CONDITIONING PERIOD:**

**FEEDERS:** Feral hogs will require a period of conditioning to feeders in which bait will be placed. Use feeders that are effective at preventing non-target wildlife from gaining access to the bait. A feeder such as the HOG STOPPER is good for reducing exposure to other animals. Lift the feeder door so that there is about a 6-inch opening and the feed can be accessed. Secure the door opening so that the hogs can eat freely. This will train the hogs to feed from the device. Should hog numbers be high, use 3 feeders in a single location, spacing these about 10 feet apart. This will allow the sounder (family group) to eat at one time, otherwise, if there are many pigs, some may move away and not eat from the location. **HOGS:** Train the hogs for 3-6 weeks to eat from the feeders with non-toxic feed by using one of 3 methods: 1) Provide about 25-50 lbs. of Kaput Feral Hog Lure in each feeder; 2) soak cracked or whole corn in water for 3-5 days until it begins to smell, then add 25-50 lbs. of wet corn to each feeder; or 3) use cracked or whole corn with a commercially available hog attractant with flavors of hog urine, fruit, or pet food smell. Avoiding the conditioning period or improper conditioning will result in reduced hog removal numbers and prolong the control effort."

**"BAITING:** Remove all non-toxic feed/lure remaining from the conditioning period. Add 25-50 lbs of Kaput Feral Hog Bait to each feeder and lower the doors. If conditioning was done properly, hogs will want

to get to the bait by lifting the door with their snout and gaining access to the bait. Hogs should begin eating the bait within several days. At the onset of baiting, check feeders every 1-5 days. Refill feeders if bait is significantly depleted or degraded, and there is still evidence of hog activity at the feeder. It is best to service the feeders at weekly or bi-weekly intervals after startup. This reduces human activity and will improve consumption. If possible check feeders during mid-day to minimize disturbance to the animals. Continue treatment for 10-21 days."

Note:

"HOG STOPPER": Scimetrix has developed a feeder that is sturdier than other brands of hog feeders currently available. We are in the process of getting this feeder trademarked, and are planning to sell this feeder to our customers in the near future.

"Kaput Feral Hog Lure": We have been doing studies with our own non-toxic (placebo) conditioning bait, and are planning to market this product in the future as part of our feral hog baiting program.

Bill: we appreciate your help with this label. Please let us know if you have any other questions during the process. Thank you, and best regards, Sue.

On Mon, Nov 14, 2016 at 7:58 AM, Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)> wrote:

There are some label issues.

The proposed directions for use do not include instructions for conditioning hogs to feeders and to the product's flavor as was done the 2015 field trial. I have my doubts about whether the product would be efficient in accomplishing its intended purpose without such instructions being on the label (and followed). You probably have similar concerns. So, the label will need to have pre-conditioning and prebaiting directions added to it. Do you want to take the first crack at writing those directions, or shall I? Either way, the label will have to indicate whether a placebo bait is to be offered to be used as a prebait.

The other major label issue is product classification, which we really have not discussed very much to this point. The proposed label does not include a "RESTRICTED USE PESTICIDE" box. Anticoagulant baits sold for above-ground use, including use in bait stations, are classified for restricted use. Although this product is formulated at one-fifth of the Warfarin concentration used in baits claimed to control commensal rodents, it is to be put out in large quantities to control large animals. Proper use of the product entails obtaining or constructing large bait dispensers and modifying them during the prebaiting process to limit access to bait to feral hogs. The conditioning and prebaiting processes require patience.

Whom do you envision this product's user community to be? An unclassified product would be available for purchase by anyone who wanted and could afford it. A restricted product would be available only to appropriately certified applicators. Either category of user might use the product appropriately or might misuse it in various ways (e.g., dispensing with the conditioning, prebaiting, and/or raccoon deterrence phases; dispensing with the dispensers entirely; etc.). Restricted-use classification would limit sales but likely also would limit misuse and lead to greater compliance with local ordinances that might pertain to where and when this type of product may be used. With restricted-use classification, it also would be easier to track purchases in the event of problems. That would be useful to government but also might be helpful to your company in the long run. Please let us know your thoughts in this area.

**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [mailto:[sue@kaputproducts.com](mailto:sue@kaputproducts.com)] **On Behalf Of** Sue Valentine  
**Sent:** Thursday, November 10, 2016 10:59 AM  
**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Hi Bill:

Just following up to see if you already had your internal meeting, or if you know when that meeting is scheduled. Let us know. Thanks, Sue.

On Tue, Oct 18, 2016 at 10:12 AM, Sue Valentine <[sue@scimetrixltd.com](mailto:sue@scimetrixltd.com)> wrote:

Thanks Bill. We will wait to hear back from you. Best regards, Sue.

On Tue, Oct 18, 2016 at 9:53 AM, Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)> wrote:

We will be able to give you more focus after we meet internally to discuss the completed reviews and possible label changes. The internal meeting will be scheduled shortly.

**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [mailto:[sue@kaputproducts.com](mailto:sue@kaputproducts.com)] **On Behalf Of** Sue Valentine  
**Sent:** Monday, October 17, 2016 1:58 PM  
**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Bill:

Richard and I would like to give you a call to get an update on our Kaput Feral Hog Bait submission, and to check if there is anything that needs to be addressed at this time. Richard and I would also like to have a meeting at EPA about this submission with Mark, Meredith and yourself to make sure we are all up to date with any developments pertaining to this application.

Would you be available tomorrow, Wednesday or Thursday for a phone conference? 10 am your time? Please let us know. Thanks, and best regards, Sue.

--

Sue Valentine

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Wellington, CO 80549

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**RESTRICTED USE PESTICIDE**

**DUE TO HAZARDS TO NONTARGET ORGANISMS**

For retail sale only to and use only by Certified Applicators, or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

# Kaput® FERAL HOG BAIT

**Active Ingredient:**

Warfarin (CAS Number 81-81-2) ..... 0.005%

**Other Ingredients** ..... 99.995%

**Total** ..... 100.000%

**Keep Out of Reach of Children**

**CAUTION**

See back [side] panel for First Aid and Precautionary Statements.

EPA Reg. No. 72500-\_\_

EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs

{25 to 100 lbs}

[[11.34 to 45.36 kg]]

{Back [Side] Panel}

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

**If swallowed**, immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If in eyes**, hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian at once.

**NOTE TO PHYSICIAN OR VETERINARIAN**

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally.

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks, and
- When handling bait or retrieving animal carcasses, chemical-resistant gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.

### ENVIRONMENTAL HAZARDS

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

### ENDANGERED SPECIES PROTECTION REQUIREMENTS

This product may have effects on endangered species. When using this product you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### READ THIS LABEL:

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label; and
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only be used to control feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands. This bait may only be applied in hog feeders equipped with heavy lids (8 to 10 lbs. of total weight) on bait compartments so as to limit direct access to bait by nontarget animals. Feral hogs must be conditioned to accept feed from the bait dispensers and to open the weighted lids to bait compartments.

- Do not apply this bait directly on the ground, including all types of ground surface (e.g., bare or plant-covered ground, paved surfaces, etc.). Apply this product only in hog feeders consistent with the description provided above.
- Apply bait in fenced areas, if available.
- When handling bait or animal carcasses, wear protective gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).
- Store this product out of reach of children, pets, domesticated animals, and wildlife.
- Post bilingual caution signs (English and Spanish) in the treated areas to warn the public of the presence of the Warfarin bait and to forbid disturbance of bait dispensers and hog carcasses. Post these signs on public roads, trails, and pathways within and at common points of access to treated areas.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (whether fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers. If bait is to be applied in areas used for grazing, ensure that all livestock are removed and excluded from those areas before applying this product.

**SELECTION OF BAITING SITES:** Baiting sites must be consistent with the limitations set forth in the **USE RESTRICTIONS** on this label (above). Before applying this product, observe the area selected for treatment to identify where hog activity and trails are located. Look for evidence of recent activity, including hog sightings, hog damage to crops, rooting of the soil, hog wallows, and fresh hog tracks and fecal material.

**PLACING AND SECURING HOG FEEDERS:** Locate hog feeders in or near probable resting areas for hogs, including brush along streams, dense cover, and tall vegetation. Do not place feeders in open areas in crops, fields, or pastures. From one to three bait feeders may be used per placement location, according to the apparent number of hogs visiting the location. Three dispensers spaced no more than 10 feet apart may be used where hog numbers are excessive (e.g., if large hog family groups, or sounders, are present). Secure feeders in place, so that hogs cannot tip over, by use of T-posts or by tying the feeders to trees or shrubs.

**CONDITIONING HOGS TO FEEDERS:** After the feeders are situated and secured, feral hogs must be conditioned (trained) to feed from them. To accomplish this, load the feeding compartments with a non-toxic feed, and open the lids to the feeding compartments by about 6 inches so that hogs can access this feed with little difficulty. To condition hogs to accept this product, use one of the following preparations as to non-toxic feed: (1) cracked or whole corn, soaked in water for 3-5 days until it has a noticeable odor; (2) cracked or whole corn treated with a commercially available hog attractant which includes scents of hog urine, fruit, or pet food; or (3) Kaput Feral Hog Lure. Load 25 to 50 lbs. of the non-toxic feed into each hog feeder. Provide access to non-toxic feed for three to six weeks, until hogs are feeding readily from the bait compartments. Failure to condition hogs to feeders or ending the conditioning period too early may reduce the number of hogs taken or prolong the period of time needed for toxic baiting.

**BAIT APPLICATION:** After feral hogs have been conditioned to take non-toxic feed from bait compartments, remove all of the non-toxic feed remaining in the feeders. Add 25 to 50 lbs. of *Kaput*® FERAL HOG BAIT to each feeder and **close lids to bait compartments** so that hogs must lift the doors with their snouts in order to access bait. (Do not load this product into feeders from which no non-toxic bait was consumed during the conditioning period.) Monitor feeders every 1 to 4 days once treatment has begun to determine whether hogs are accessing bait, to assess whether bait is being spilled around feeders, and to replenish bait, if appropriate. Refill feeders if bait is significantly depleted or degraded, and there still is evidence of hog activity at the feeder. As bait take and hog numbers decline, the feeders may be monitored at 5-day intervals, but site surveillance must continue as described

below. If possible, feeders should be checked at mid-day to minimize disturbance to feral hogs. Bait spilled around feeders must be collected and disposed of properly.

**SURVEILLANCE AND FOLLOW-UP:** Dead hogs may begin to appear in or near the treatment areas within 4 to 7 days after bait placement. Applicators must return to the treatment site within 4 days after the first bait placements were made, and at 2- to 4-day intervals thereafter, to inspect the site for evidence of dead or dying feral hogs and/or dead nontarget animals. All carcasses found must be disposed of properly. Carcasses may be buried on site in holes dug deeply enough that the entire carcass is at least 18 inches below the ground surface. Cover buried carcasses up to the level of the surrounding ground. If burial is not practical (e.g., due to frozen or extremely hard ground) and other disposal methods are allowed by State and local authorities, carcasses may be disposed of by other methods to ensure that carcasses are not accessible to scavengers. Continue to monitor the treatment area to collect and dispose of feral hogs and to search for non-target animals for at least two weeks after the removal of all bait from the hog feeders. Deaths of any animals other than feral hogs that appear to be the result of baiting with this product must be reported to State authorities.

**Note:** A dye in this product will impart a blue color to the fatty tissues of hogs and other animals that have eaten the bait.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Offer for recycling, if available, or reconditioning, if appropriate; otherwise, dispose of empty container in a sanitary landfill.

Batch Code [Lot Number]: {Description of where lot number is located}

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

#### WARRANTY

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

#### [WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE

OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

#### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

**If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded.**  
*By using the goods, you expressly agree to all of the terms and conditions of this contract.]*

[Attention [Notice]: This product contains a chemical known to the state of California to cause birth defects or other reproductive harm.]

Manufactured by:

**Scimetrics**  
LTD. CORP.

**[Pest Management Solutions]**

P.O. Box 1045

Wellington, CO 80549

(970) 482-1330

[customerservice@kaputproducts.com](mailto:customerservice@kaputproducts.com)

Made in [the] U.S.A. [USA]

**[Kaput® is a registered trademark of Scimetrics Ltd. Corporation]**

**{ } Denotes language that does not appear on the market label**

**[ ] Denotes alternate/optional language**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 25, 2016

Rebecca Horton  
Consultant/Agent for Retta Manufacturing, Inc.  
c/o Registrations by Design, Inc.  
PO Box 1019  
Salem, VA 24153-1019

Subject: CSF Notification per PRN 98-10: Adds Alternate CSF # 4 dated 11/04/2016  
Product Name: Moss B Ware  
EPA Registration Number: 10699-1  
Application Date: November 04, 2016  
Decision Number: 523402

Dear Ms. Horton:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 04/02/2002
- Alternate CSF #1 dated 04/02/2002
- Alternate CSF #2 dated 02/26/2013
- Alternate CSF #3 dated 03/02/2016
- Alternate CSF #4 dated 11/04/2016

Any CSFs other than those listed above are superseded/no longer valid.

If you have any questions, please contact Tony Kish by phone at 703 308-9443, or via email at [kish.tony@epa.gov](mailto:kish.tony@epa.gov); or Craig Reeves by phone at 703 347-0486, or via email at [reeves.craig@epa.gov](mailto:reeves.craig@epa.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Kish".

Tony Kish, Product Manager 22, Fungicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

### **RECOMMENDED TEXT FOR WARNING SIGNS**

#### **CAUTION / PRECAUCIÓN**

- Warfarin bait to control feral hogs is being used in this area/Cebo con warfarin se utiliza en esta área para controlar marrano salvajes
- Do not touch dead animals or bait dispensers/No toque animales muertos ni dispensadores de cebo
- Do not eat meat from animals shot or found dead in this area/No comer carne de animales disparados o encontrados muertos en esta zona
- Do not eat animals with internal parts that are dyed blue/No comer animales con partes internas teñidas azul
- Do not allow livestock to graze in this area/En esta zona no permita ganado a pacer

## Jacobs, William

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**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Wednesday, November 23, 2016 9:51 AM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Bill:

This is to confirm the receipt of your email and Feral Hog draft label. Looks pretty good! We are working on these changes and are planning to email an updated version back to you today. Then we can work on the fine-tuning and hopefully finalize it by next week. Thanks again for your help! Sue.

On Tue, Nov 22, 2016 at 1:55 PM, Jacobs, William <Jacobs.Bill@epa.gov> wrote:

I have read through your suggestions from November 15 and have taken a stab at amending the **DIRECTIONS FOR USE** section as well as other areas of the pending label (submitted on August 18, 2016). I also have considered site-posting requirements. See attachment.

We will need an amended label incorporating text pertaining to conditioning and classification pretty soon if this action is to stay on schedule/

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**Sent:** Tuesday, November 15, 2016 10:10 AM

**To:** Jacobs, William <Jacobs.Bill@epa.gov>  
**Cc:** richard@genesislabs.com  
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Bill:

Thanks for your comments:

1. We agree the label should be Restricted Use Pesticide, that is the safe approach even with the low concentration of warfarin.

2. We are also in agreement with you that the label has to have more comprehensive Directions for Use instructions, and would like for you to do an initial write up of those directions. We have given it some thought as well, and have following suggestions:

**"SELECTION OF BAITING SITES:** Choose areas to bait that are in probable resting areas for hogs, such as brush along streams, dense cover, and tall vegetation. Look for signs of feral hogs such as tracks, visual sightings, fecal material, rooting, wallows, and crop damage. Do not place feeders in crops, open fields, or areas where livestock is kept. Remove livestock before baiting if you use in cattle grazing lands. If hog numbers are excessive, place 3 feeders within 10 feet apart. Secure feeders with T-posts, tying to trees or shrubs to ensure hogs do not tip feeders over and expose other animals to the feed or bait."

#### **"CONDITIONING PERIOD:**

**FEEDERS:** Feral hogs will require a period of conditioning to feeders in which bait will be placed. Use feeders that are effective at preventing non-target wildlife from gaining access to the bait. A feeder such as the HOG STOPPER is good for reducing exposure to other animals. Lift the feeder door so that there is about a 6-inch opening and the feed can be accessed. Secure the door opening so that the hogs can eat freely. This will train the hogs to feed from the device. Should hog numbers be high, use 3 feeders in a single location, spacing these about 10 feet apart. This will allow the sounder (family group) to eat at one time, otherwise, if there are many pigs, some may move away and not eat from the location. **HOGS:** Train the hogs for 3-6 weeks to eat from the feeders with non-toxic feed by using one of 3 methods: 1) Provide about 25-50 lbs. of Kaput Feral Hog Lure in each feeder; 2) soak cracked or whole corn in water for 3-5 days until it begins to smell, then add 25-50 lbs. of wet corn to each feeder; or 3) use cracked or whole corn with a commercially available hog attractant with flavors of hog urine, fruit, or pet food smell. Avoiding the conditioning period or improper conditioning will result in reduced hog removal numbers and prolong the control effort."

**"BAITING:** Remove all non-toxic feed/lure remaining from the conditioning period. Add 25-50 lbs of Kaput Feral Hog Bait to each feeder and lower the doors. If conditioning was done properly, hogs will want to get to the bait by lifting the door with their snout and gaining access to the bait. Hogs should begin eating the bait within several days. At the onset of baiting, check feeders every 1-5 days. Refill feeders if bait is significantly depleted or degraded, and there is still evidence of hog activity at the feeder. It is best to service the feeders at weekly or bi-weekly intervals after startup. This reduces human activity and will improve consumption. If possible check feeders during mid-day to minimize disturbance to the animals. Continue treatment for 10-21 days."

Note:

**"HOG STOPPER":** Scimetrix has developed a feeder that is sturdier than other brands of hog feeders currently available. We are in the process of getting this feeder trademarked, and are planning to sell this feeder to our customers in the near future.

**"Kaput Feral Hog Lure":** We have been doing studies with our own non-toxic (placebo) conditioning bait, and are planning to market this product in the future as part of our feral hog baiting program.

Bill: we appreciate your help with this label. Please let us know if you have any other questions during the process. Thank you, and best regards, Sue.

On Mon, Nov 14, 2016 at 7:58 AM, Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)> wrote:

There are some label issues.

The proposed directions for use do not include instructions for conditioning hogs to feeders and to the product's flavor as was done the 2015 field trial. I have my doubts about whether the product would be efficient in accomplishing its intended purpose without such instructions being on the label (and followed). You probably have similar concerns. So, the label will need to have pre-conditioning and prebaiting directions added to it. Do you want to take the first crack at writing those directions, or shall I? Either way, the label will have to indicate whether a placebo bait is to be offered to be used as a prebait.

The other major label issue is product classification, which we really have not discussed very much to this point. The proposed label does not include a "RESTRICTED USE PESTICIDE box. Anticoagulant baits sold for above-ground use, including use in bait stations, are classified for restricted use. Although this product is formulated at one-fifth of the Warfarin concentration used in baits claimed to control commensal rodents, it is to be put out in large quantities to control large animals. Proper use of the product entails obtaining or constructing large bait dispensers and modifying them during the prebaiting process to limit access to bait to feral hogs. The conditioning and prebaiting processes require patience.

Whom do you envision this product's user community to be? An unclassified product would be available for purchase by anyone who wanted and could afford it. A restricted product would be available only to appropriately certified applicators. Either category of user might use the product appropriately or might misuse it in various ways (e.g., dispensing with the conditioning, prebaiting, and/or raccoon deterrence phases; dispensing with the dispensers entirely; etc.). Restricted-use classification would limit sales but likely also would limit misuse and lead to greater compliance with local ordinances that might pertain to where and when this type of product may be used. With restricted-use classification, it also would be easier to track purchases in the event of problems. That would be useful to government but also might be helpful to your company in the long run. Please let us know your thoughts in this area.

**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [mailto:[sue@kaputproducts.com](mailto:sue@kaputproducts.com)] **On Behalf Of** Sue Valentine  
**Sent:** Thursday, November 10, 2016 10:59 AM  
**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Hi Bill:

Just following up to see if you already had your internal meeting, or if you know when that meeting is scheduled. Let us know. Thanks, Sue.

On Tue, Oct 18, 2016 at 10:12 AM, Sue Valentine <[sue@scimetricsltd.com](mailto:sue@scimetricsltd.com)> wrote:

Thanks Bill. We will wait to hear back from you. Best regards, Sue.

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Bill:

Richard and I would like to give you a call to get an update on our Kaput Feral Hog Bait submission, and to check if there is anything that needs to be addressed at this time. Richard and I would also like to have a meeting at EPA about this submission with Mark, Meredith and yourself to make sure we are all up to date with any developments pertaining to this application.

Would you be available tomorrow, Wednesday or Thursday for a phone conference? 10 am your time? Please let us know. Thanks, and best regards, Sue.

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## Jacobs, William

**From:** Jacobs, William  
**Sent:** Tuesday, November 22, 2016 3:55 PM  
**To:** 'Sue Valentine'  
**Cc:** richard@genesislabs.com  
**Subject:** RE: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17  
**Attachments:** 72500-EA-20161122-Suggested Label Revisions - WWJ.docx

5995078  
R230/1135

5976028  
R230 11135  
5990692  
R230/1135

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RESTRICTED USE PESTICIDE box

**RESTRICTED USE PESTICIDE**  
**DUE TO HAZARDS TO NONTARGET ORGANISMS**  
For retail sale only to and use only by Certified Applicators, or persons under their direct supervision,  
and only for those uses covered by the Certified Applicator's certification.

DIRECTIONS FOR USE

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THIS LABEL:** Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals, or nontarget wildlife to this product. To help prevent accidents:

1. store product not in use in locations out of reach of children, pets, domesticated animals, and wildlife;
2. apply this product only as specified on this label; and
3. dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only be used to control feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands. This bait may only be applied in hog feeders equipped with heavy lids (8 to 10 lbs. of total weight) on bait compartments so as to limit direct access to bait by nontarget animals. Feral hogs must be conditioned to accept feed from the bait dispensers and to open the weighted lids to bait compartments.

- Do not apply this bait directly on the ground, including all types of ground surface (e.g., bare or plant-covered ground, paved surfaces, etc.). Apply this product only in hog feeders consistent with the description provided above.
- Apply bait in fenced areas, if available.
- When handling bait or animal carcasses, wear protective gloves made of barrier laminate, polyethylene, butyl rubber (≥14 mils), nitrile rubber (≥14 mils), neoprene rubber (≥14 mils), natural rubber (≥14 mils), polyvinyl chloride (≥14 mils), or Viton (≥14 mils).
- Store this product out of reach of children, pets, domesticated animals, and wildlife.
- Post treated areas with bilingual (English and Spanish) signs to warn the public of the presence of the Warfarin bait and to forbid disturbance of bait dispensers and hog carcasses. Post these signs on public roads, trails, and pathways within and at common points of access to treated areas.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (whether fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers. If bait is to be applied in areas used for grazing, ensure that all livestock are removed and excluded from those areas before applying this product.

**SELECTION OF BAITING SITES:** Baiting sites must be consistent with the limitations set forth in the **USE RESTRICTIONS** on this label (above). Before applying this product, observe the area selected for treatment to identify where hog activity and trails are located. Look for evidence of recent activity, including hog sightings, hog damage to crops, rooting of the soil, hog wallows, and fresh hog tracks and fecal material.

**PLACING AND SECURING HOG FEEDERS:** Locate hog feeders in or near probable resting areas for hogs, including brush along streams, dense cover, and tall vegetation. Do not place feeders in open areas in crops, fields, or pastures. From one to three bait feeders may be used per placement location, according to the apparent number of hogs visiting the location. Three dispensers spaced no more than 10 feet apart may be used where hog numbers are excessive (e.g., if large hog family groups, or sounders, are present). Secure feeders in place, so that hogs cannot tip over, by use of T-posts or by tying the feeders to trees or shrubs.

**CONDITIONING HOGS TO FEEDERS:** After the feeders are situated and secured, feral hogs must be conditioned (trained) to feed from them. To accomplish this, load the feeding compartments with a non-toxic feed, and open the lids to the feeding compartments by about 6 inches so that hogs can access this feed with little difficulty. To condition hogs to accept this product, use one of the following preparations as the non-toxic feed: (1) cracked or whole corn, soaked in water for 3-5 days until it has a noticeable odor; (2) cracked or whole corn treated with a commercially available hog attractant which includes scents of hog urine, fruit, or pet food; or (3) Kaput Feral Hog Lure. Load 25 to 50 lbs. of the non-toxic feed into each hog feeder. Provide access to non-toxic feed for three to six weeks, until hogs are feeding readily from the bait compartments. Failure to condition hogs to feeders or ending the conditioning period too early may reduce the number of hogs taken or prolong the period of time needed for toxic baiting.

**BAIT APPLICATION:** After feral hogs have been conditioned to take non-toxic feed from bait compartments, remove all of the non-toxic feed remaining in the feeders. Add 25 to 50 lbs. of *Kaput*® FERAL HOG BAIT to each feeder and **close lids to bait compartments** so that hogs must lift the doors with their snouts in order to access bait. (Do not load this product into feeders from which no non-toxic bait was consumed during the conditioning period.) Monitor feeders every 1 to 4 days once treatment has begun to determine whether hogs are accessing bait, to assess whether bait is being spilled around feeders, and to replenish bait, if appropriate. Refill feeders if bait is significantly depleted or degraded, and there still is evidence of hog activity at the feeder. As bait take and hog numbers decline, the feeders may be monitored at 5-day intervals, but site surveillance must continue as described below. If possible, feeders should be checked at mid-day to minimize disturbance to feral hogs. Bait spilled around feeders must be collected and disposed of properly.

**SURVEILLANCE AND FOLLOW-UP:** Dead hogs may begin to appear in or near the treatment areas within 4 to 7 days after bait placement. Applicators must return to the treatment site within 4 days after the first bait placements were made, and at 2- to 4-day intervals thereafter, to inspect the site for evidence of dead or dying feral hogs and/or dead nontarget animals. All carcasses found must be disposed of

properly. Carcasses may be buried on site in holes dug deeply enough that the entire carcass is at least 18 inches below the ground surface. Cover buried carcasses up to the level of the surrounding ground. If burial is not practical (e.g., due to frozen or extremely hard ground) and other disposal methods are allowed by State and local authorities, carcasses may be disposed of by other methods to ensure that carcasses are not accessible to scavengers. Continue to monitor the treatment area to collect and dispose of feral hogs and to search for non-target animals for at least two weeks after the removal of all bait from the hog feeders. Deaths of any animals other than feral hogs that appear to be the result of baiting with this product must be reported to State authorities.

**Note:** A dye in this product will impart a blue color to the fatty tissues of hogs and other animals that have eaten the bait.

#### *Notes on DIRECTIONS FOR USE:*

*Requiring use of “commercially available” feeders could prevent users from inventing their own dispensers, which might (or might not) be superior to those that currently are “commercially available”. Such a restriction could stifle practical experimentation and, by inference, useful innovation. There are restraint-of-trade issues involved with specifying a specific models or brand names for application equipment of other types of products used in conjunction with pesticide products. From your perspective, specifying your own dispenser (“HOG STOPPER”?) would have customers using a model that you know and trust but also one from which you alone would profit. In the case of the Kaput ... Lure”, your proposed text at least mentions alternative feeds that should be readily available. The closer one gets to a true placebo for the toxic bait’s formulation during the conditioning period, at least in theory, the more readily hogs would attack the toxic bait when it is placed.*

*It might be a good idea to close the lids on bait dispensers near the end of the conditioning period so that hogs are not faced simultaneously with the problem of how now to access the hoppers and the decision of whether to take a somewhat different formulation. If it were established first that the hogs will open the lids, then the subsequent challenge only would be to get them to eat the toxic bait.*

#### **LABEL FORMAT**

The “**FIRST AID**” text (including “**TREATMENT FOR PET POISONING**” and “**NOTE TO PHYSICIAN**”) should be boxed and must be moved to be set apart from the label subsections that follow “**PRECAUTIONARY STATEMENTS**”. Both the “**FIRST AID**” box and the material under “**PRECAUTIONARY STATEMENTS**” (including the “**ENVIRONMENTAL HAZARDS**” and “**ENDANGERED SPECIES REQUIREMENTS**” paragraphs should precede the “**DIRECTIONS FOR USE**” section.

#### **OTHER CHANGES**

1. Immediately below the “**CAUTION:**” paragraph (page 2), insert the “**PERSONAL PROTECTIVE EQUIPMENT (PPE)**” text shown immediately below.

#### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

##### **Applicators and Other Handlers Must Wear:**

- Long-sleeved shirt and long pants,
- Shoes plus socks, and

- When handling bait or retrieving animal carcasses, chemical-resistant gloves made of barrier laminate, polyethylene, butyl rubber ( $\geq 14$  mils), nitrile rubber ( $\geq 14$  mils), neoprene rubber ( $\geq 14$  mils), natural rubber ( $\geq 14$  mils), polyvinyl chloride ( $\geq 14$  mils), or Viton ( $\geq 14$  mils).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

2. Directly below the "PPE" text, insert a "USER SAFETY RECOMMENDATIONS" box that reads and appears as shown immediately below.

USER SAFETY RECOMMENDATIONS
<p>Users should:</p> <ul style="list-style-type: none"> <li>• Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.</li> <li>• Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.</li> <li>• Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.</li> </ul>

3. In second sentence of the "ENDANGERED SPECIES REQUIREMENTS" paragraph, change "county I which" to "county in which".

#### CONTENT OF WARNING SIGNS

*The signs should warn the public of the presence of the toxic bait. The two major messages to convey would seem to be not to touch or disturb the bait placements and not to consume or allow pets to consume hogs shot or found dead in or near the treatment area. Given the distances that hogs can cover and the slowness of the toxic action of Warfarin, carcasses and live animals with Warfarin residues could be found over a much wider area than the area that was baited. Suggested text for warning sign appears below.*

### **CAUTION**

WARFARIN BAIT TO CONTROL FERAL HOGS IS BEING USED IN THIS AREA.

DO NOT TOUCH DEAD ANIMALS OR BAIT DISPENSERS.

DO NOT EAT MEAT FROM ANIMALS SHOT OR FOUND DEAD IN THIS AREA.

DO NOT EAT ANY ANIMALS WITH INTERNAL PARTS THAT ARE DYED BLUE.

DO NOT ALLOW LIVESTOCK TO GRAZE IN THIS AREA.

### **PRECAUCIÓN**

*[Spanish equivalents of English text shown above]*

## Jacobs, William

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**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Tuesday, November 15, 2016 10:10 AM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

S 995078

Bill:

Thanks for your comments:

1. We agree the label should be Restricted Use Pesticide, that is the safe approach even with the low concentration of warfarin.
2. We are also in agreement with you that the label has to have more comprehensive Directions for Use instructions, and would like for you to do an initial write up of those directions. We have given it some thought as well, and have following suggestions:

**"SELECTION OF BAITING SITES:** Choose areas to bait that are in probable resting areas for hogs, such as brush along streams, dense cover, and tall vegetation. Look for signs of feral hogs such as tracks, visual sightings, fecal material, rooting, wallows, and crop damage. Do not place feeders in crops, open fields, or areas where livestock is kept. Remove livestock before baiting if you use in cattle grazing lands. If hog numbers are excessive, place 3 feeders within 10 feet apart. Secure feeders with T-posts, tying to trees or shrubs to ensure hogs do not tip feeders over and expose other animals to the feed or bait."

### **"CONDITIONING PERIOD:**

**FEEDERS:** Feral hogs will require a period of conditioning to feeders in which bait will be placed. Use feeders that are effective at preventing non-target wildlife from gaining access to the bait. A feeder such as the HOG STOPPER is good for reducing exposure to other animals. Lift the feeder door so that there is about a 6-inch opening and the feed can be accessed. Secure the door opening so that the hogs can eat freely. This will train the hogs to feed from the device. Should hog numbers be high, use 3 feeders in a single location, spacing these about 10 feet apart. This will allow the sounder (family group) to eat at one time, otherwise, if there are many pigs, some may move away and not eat from the location. **HOGS:** Train the hogs for 3-6 weeks to eat from the feeders with non-toxic feed by using one of 3 methods: 1) Provide about 25-50 lbs. of Kaput Feral Hog Lure in each feeder; 2) soak cracked or whole corn in water for 3-5 days until it begins to smell, then add 25-50 lbs. of wet corn to each feeder; or 3) use cracked or whole corn with a commercially available hog attractant with flavors of hog urine, fruit, or pet food smell. Avoiding the conditioning period or improper conditioning will result in reduced hog removal numbers and prolong the control effort."

**"BAITING:** Remove all non-toxic feed/lure remaining from the conditioning period. Add 25-50 lbs of Kaput Feral Hog Bait to each feeder and lower the doors. If conditioning was done properly, hogs will want to get to the bait by lifting the door with their snout and gaining access to the bait. Hogs should begin eating the bait within several days. At the onset of baiting, check feeders every 1-5 days. Refill feeders if bait is significantly depleted or degraded, and there is still evidence of hog activity at the feeder. It is best to service the feeders at weekly or bi-weekly intervals after startup. This reduces human activity and will improve consumption. If possible check feeders during mid-day to minimize disturbance to the animals. Continue treatment for 10-21 days."

Note:

“HOG STOPPER”: Scimetrix has developed a feeder that is sturdier than other brands of hog feeders currently available. We are in the process of getting this feeder trademarked, and are planning to sell this feeder to our customers in the near future.

“Kaput Feral Hog Lure”: We have been doing studies with our own non-toxic (placebo) conditioning bait, and are planning to market this product in the future as part of our feral hog baiting program.

Bill: we appreciate your help with this label. Please let us know if you have any other questions during the process. Thank you, and best regards, Sue.

On Mon, Nov 14, 2016 at 7:58 AM, Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)> wrote:

There are some label issues.

The proposed directions for use do not include instructions for conditioning hogs to feeders and to the product's flavor as was done the 2015 field trial. I have my doubts about whether the product would be efficient in accomplishing its intended purpose without such instructions being on the label (and followed). You probably have similar concerns. So, the label will need to have pre-conditioning and prebaiting directions added to it. Do you want to take the first crack at writing those directions, or shall I? Either way, the label will have to indicate whether a placebo bait is to be offered to be used as a prebait.

The other major label issue is product classification, which we really have not discussed very much to this point. The proposed label does not include a “RESTRICTED USE PESTICIDE box. Anticoagulant baits sold for above-ground use, including use in bait stations, are classified for restricted use. Although this product is formulated at one-fifth of the Warfarin concentration used in baits claimed to control commensal rodents, it is to be put out in large quantities to control large animals. Proper use of the product entails obtaining or constructing large bait dispensers and modifying them during the prebaiting process to limit access to bait to feral hogs. The conditioning and prebaiting processes require patience.

Whom do you envision this product's user community to be? An unclassified product would be available for purchase by anyone who wanted and could afford it. A restricted product would be available only to appropriately certified applicators. Either category of user might use the product appropriately or might misuse it in various ways (e.g., dispensing with the conditioning, prebaiting, and/or raccoon deterrence phases; dispensing with the dispensers entirely; etc.). Restricted-use classification would limit sales but likely also would limit misuse and lead to greater compliance with local ordinances that might pertain to where and when this type of product may be used. With restricted-use classification, it also would be easier to track purchases in the event of problems. That would be useful

to government but also might be helpful to your company in the long run. Please let us know your thoughts in this area.

**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [mailto:[sue@kaputproducts.com](mailto:sue@kaputproducts.com)] **On Behalf Of** Sue Valentine  
**Sent:** Thursday, November 10, 2016 10:59 AM  
**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Hi Bill:

Just following up to see if you already had your internal meeting, or if you know when that meeting is scheduled. Let us know. Thanks, Sue.

On Tue, Oct 18, 2016 at 10:12 AM, Sue Valentine <[sue@scimetricsltd.com](mailto:sue@scimetricsltd.com)> wrote:

Thanks Bill. We will wait to hear back from you. Best regards, Sue.

On Tue, Oct 18, 2016 at 9:53 AM, Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)> wrote:

We will be able to give you more focus after we meet internally to discuss the completed reviews and possible label changes. The internal meeting will be scheduled shortly.

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**Sent:** Monday, October 17, 2016 1:58 PM  
**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Bill:

Richard and I would like to give you a call to get an update on our Kaput Feral Hog Bait submission, and to check if there is anything that needs to be addressed at this time. Richard and I would also like to have a meeting at EPA about this submission with Mark, Meredith and yourself to make sure we are all up to date with any developments pertaining to this application.

Would you be available tomorrow, Wednesday or Thursday for a phone conference? 10 am your time? Please let us know. Thanks, and best regards, Sue.

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Sue Valentine

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## Jacobs, William

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**From:** Jacobs, William  
**Sent:** Monday, November 14, 2016 9:58 AM  
**To:** 'Sue Valentine'  
**Cc:** richard@genesislabs.com  
**Subject:** RE: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

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**From:** sue@kaputproducts.com [mailto:sue@kaputproducts.com] **On Behalf Of** Sue Valentine  
**Sent:** Thursday, November 10, 2016 10:59 AM  
**To:** Jacobs, William <Jacobs.Bill@epa.gov>  
**Cc:** richard@genesislabs.com  
**Subject:** Re: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

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**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [mailto:[sue@kaputproducts.com](mailto:sue@kaputproducts.com)] **On Behalf Of** Sue Valentine

**Sent:** Monday, October 17, 2016 1:58 PM

**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>

**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)

**Subject:** Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

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**Jacobs, William**

---

**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Thursday, August 18, 2016 11:49 AM  
**To:** Suarez, Mark  
**Cc:** Jacobs, William; richard@genesislabs.com  
**Subject:** Name Change for Hog-Gone Submission, 72500-EA  
**Attachments:** 72500-EA Kaput Feral Hog Bait Proposed Labeling 08.18.16.pdf

S 990692

Mark:

We would like to re-name our label to "Kaput Feral Hog Bait". Please see updated label attached.

Let me know if you need anything else at this time. I can also update other documentation if necessary, e.g., CSF, Data Matrix etc. Just let me know.

Thank you, and best regards, Sue.

--

Sue Valentine  
Scimetrics Ltd. Corp.  
PO Box 1045  
Wellington, CO 80549  
Ph. 970-482-1330

## Jacobs, William

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**From:** Jacobs, William  
**Sent:** Tuesday, October 18, 2016 11:53 AM  
**To:** 'Sue Valentine'  
**Subject:** RE: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

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**To:** Jacobs, William <Jacobs.Bill@epa.gov>  
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**Subject:** Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

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## Kaput® FERAL HOG BAIT

**Active Ingredient:**

Warfarin (CAS Number 81-81-2) .....	0.005%
<b>Other Ingredients</b> .....	<u>99.995%</u>
<b>Total</b> .....	100.000%

**Keep Out of Reach of Children**

**CAUTION**

**See back [side] panel for First Aid and additional Precautionary Statements.**

EPA Reg. No. 72500-\_  
EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs  
{25 to 100 lbs}  
[[11.34 to 45.36 kg]]

{Back [Side] Panel}

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THIS LABEL:**

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label.
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may be used to control only feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands.

- Do not apply this bait on the ground.
- Use a commercially available hog feeder with a heavy lid (approximately 8-10 lbs. total lid weight) to prevent non-target animals from accessing the bait.
- Apply bait in fenced areas if available.
- Wear protective gloves when handling bait or animal carcasses.
- Store this product out of reach of children and away from humans, domesticated animals, pets and wildlife.
- Do not allow young children, pets, domesticated animals or persons not associated with the application to be in areas where the bait is being applied.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers.

**SITE ASSESSMENT:** Before applying this product, observe the area to identify where feral hog activity and trails are evident. Look for damaged crops, rutting of the soil and tracks to ensure activity in the area.

**BAIT APPLICATION:** To kill feral hogs, put 25-50 pounds of bait into each feeder, depending upon hog density. Place three feeders in a cluster, approximately 10 feet apart. Place one cluster per 200 acres. Position feeders in scrub or wooded areas where hogs frequent during the day. Avoid placing feeders in open crops, fields or pastures. Secure feeders to the ground in their up-right position with stakes and or T-posts. The animal access door must be closed to limit access to only feral hogs. Continue treatment for 10-21 days. Monitor feeders every 1-5 days, preferably in the early morning. Refill feeders if bait is significantly depleted or degraded and there is still evidence of hog activity at the feeder. **Leave no bait on soil surface or outside the feeder.** Collect and properly dispose of all bait that has spilled outside the feeder. After treatment, collect and properly dispose of any bait that has fallen out of the feeder.

**SURVEILLANCE AND FOLLOW-UP:** Dead feral hogs may begin to appear in or near the treatment areas within 4-7 days after bait placement. Applicators must return to the treatment site within 4 days of application, and at 2- to 5-day intervals thereafter, to inspect each feeder and to collect and properly dispose of any bait found on the surface or dead/dying feral hogs. All carcasses found must be collected and properly disposed. Bury carcasses on site in holes dug deep enough that the entire carcass is at least 18 inches below ground level. Cover carcasses with earth up to the level of the surrounding ground. If burial is not practical (due to frozen ground, etc.) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by other methods to ensure that carcasses are inaccessible to scavengers. Continue to collect and dispose of feral hogs and search for non-target animals for at least two weeks after the last filling of the bait feeder boxes. Deaths of any animals other than feral hogs that appear to be the result of baiting must be reported to state authorities.

**Note:** Blue dye in this product will color the fatty tissue of the feral hog blue as an indicator that animal has consumed the bait.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Offer for recycling, if available, or reconditioning, if appropriate; otherwise, dispose of empty container in a sanitary landfill.

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

#### PRECAUTIONARY STATEMENTS

##### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

#### FIRST AID

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

**If swallowed,** immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If in eyes,** hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

### **TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian at once.

### **NOTE TO PHYSICIAN OR VETERINARIAN**

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally.

### **ENVIRONMENTAL HAZARDS**

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

### **ENDANGERED SPECIES PROTECTION REQUIREMENTS**

This product may have effects on endangered species. When using this product you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

### **WARRANTY**

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

### **[WARRANTY DISCLAIMER**

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER

BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

**If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded.**  
*By using the goods, you expressly agree to all of the terms and conditions of this contract.]*

[Attention [Notice]: This product contains a chemical known to the state of California to cause birth defects or other reproductive harm.]

Manufactured by:

**Scimetrics**  
LTD. CORP.

**[Pest Management Solutions]**

P.O. Box 1045

Wellington, CO 80549

(970) 482-1330

[customerservice@kaputproducts.com](mailto:customerservice@kaputproducts.com)

Made in the U.S.A.

**[Kaput® is a registered trademark of Scimetrics Ltd. Corporation]**

*{ } Denotes language that does not appear on the market label*

*[ ] Denotes alternate/optional language*

## Jacobs, William

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**From:** Laws, Meredith  
**Sent:** Monday, October 17, 2016 3:19 PM  
**To:** Jacobs, William  
**Cc:** Suarez, Mark  
**Subject:** RE: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Please get together and make a recommendation to me about what to go forward with. I don't have much time for a meeting.

SFIREG did not respond to my request that they discuss RU. I've thought about it and I don't think it should be restricted.

**From:** Jacobs, William  
**Sent:** Monday, October 17, 2016 2:11 PM  
**To:** Laws, Meredith <Laws.Meredith@epa.gov>  
**Cc:** Suarez, Mark <Suarez.Mark@epa.gov>  
**Subject:** FW: Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Scimetrix wants an update this week regarding their pending Section 3 application for a feral hog bait. The reviews are all back (as of last week), but we have not had an internal meeting yet to discuss additional requirements (probably none besides label changes and possibly restricted use classification). My preference would be to schedule our meeting first and then get back to Scimetrix, unless we are pretty sure now that the remaining issues pertain only to label changes. EFED's review mentions data gaps, but it is not clear to me that those are meant to apply to this new use as opposed to Registration Review for the chemical. The hog use involves much more bait per placement than do the registered uses, but the baits for the registered uses contain Warfarin at concentrations that are at least 5X the concentration as is proposed for the hog bait.

**From:** [sue@kaputproducts.com](mailto:sue@kaputproducts.com) [<mailto:sue@kaputproducts.com>] **On Behalf Of** Sue Valentine  
**Sent:** Monday, October 17, 2016 1:58 PM  
**To:** Jacobs, William <[Jacobs.Bill@epa.gov](mailto:Jacobs.Bill@epa.gov)>  
**Cc:** [richard@genesislabs.com](mailto:richard@genesislabs.com)  
**Subject:** Kaput Feral Hog Bait, 72500-EA, PRIA Date 02.13.17

Bill:

Richard and I would like to give you a call to get an update on our Kaput Feral Hog Bait submission, and to check if there is anything that needs to be addressed at this time. Richard and I would also like to have a meeting at EPA about this submission with Mark, Meredith and yourself to make sure we are all up to date with any developments pertaining to this application.

Would you be available tomorrow, Wednesday or Thursday for a phone conference? 10 am your time? Please let us know. Thanks, and best regards, Sue.

--

Sue Valentine  
Scimetrix Ltd. Corp.  
PO Box 1045  
Wellington, CO 80549  
Ph. 970-482-1330

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

**MEMORANDUM**

**Date:** 25-MAY-2016

**SUBJECT:** Warfarin -Section 3 Registration of Kaput HOG-GONE to Control Feral Hogs.

**PC Code:** 086002

**Decision Nos.:** 510475

**Risk Assessment Type:** Single Chemical

**Petition No.:** None

**TXR No.:** NA

**MRID No.:** 49744401

**DP Barcodes:** D432728

**Registration Nos.:** 72500-EA

**Regulatory Action:** Section 3  
Registration

**Case No.:** NA

**CAS No.:** 81-81-2

**40 CFR:** NA

**FROM:** Mohsen Sahafeyan, Chemist/Risk Assessor *Mohsen Sahafeyan*  
Monica Hawkins, Ph.D., Environmental Health Scientist/ORE Assessor *Monica Hawkins*  
Yung Yang, Ph.D., Toxicologist *Yung Yang*  
Risk Assessment Branch VI  
Health Effects Division (7509P)

**THROUGH:** Donna S. Davis, Branch Chief *Donna Davis*  
Registration Action Branch 6 (RAB6)  
Health Effects Division (HED, 7509P)

**TO:** William Jacobs, Ph.D., Risk Manager Reviewer  
Mark Suarez, Risk Manager  
Insecticide/Rodenticide Branch  
Registration Division

**Conclusion:**

Scimetrics Ltd. Corporation has petitioned for section 3 registration of Kaput HOG-GONE (EPA Reg. No. 72500-EA), a solid-based bait containing 0.005% of active ingredient warfarin for control of feral hog population. The company previously petitioned for experimental use permits twice for similar baits with 0.005% warfarin

which were granted (M. Sahafeyan, D413046, 9/12/2013 and D425410, 6/23/2015). The company has now submitted field efficacy report from a previous EUP study in conjunction with this petition. HED has reviewed the submitted efficacy report that confirms the effectiveness of 0.005% warfarin baits in controlling feral hogs. The proposed label instruction which is similar to the previous EUPs is such that it minimizes the potential exposure of warfarin to adults, children, and livestock via food or drinking water. Because there is no expectation of exposures from drinking water, dietary food, or potential non-dietary sources due to provisions made on the proposed label, aggregate risk was not quantitatively considered. Given these considerations, exposures to Kaput HOG-GONE do not pose a significant human health risk under the proposed uses outlined in this petition. HED has no objection to granting the section 3 registration of Kaput HOG-GONE to control feral hog populations.

**References:**

1. Study Report (MRID No. 49744401-C): Gregory A. Franckowiak, "Field Efficacy of Kaput® Feral Hog Bait for Controlling Feral Hogs (*Sus scrofa*) in Texas". September 14, 2015. STUDY NUMBER. 15002. p.349
2. Memorandum: M. Sahafeyan, "Warfarin – Human Health Risk Assessment of the Requested Experimental Use Permit to Control Feral hogs" D413046, 9/12/2013
3. Memorandum: M. Sahafeyan, "Warfarin – Human Health Risk Assessment of the Requested Experimental Use Permit (EUP) to Control Feral Hogs" D425410, 6/23/2015

## Jacobs, William

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**From:** Mathur, Shyam  
**Sent:** Thursday, April 14, 2016 1:01 PM  
**To:** Jacobs, William  
**Subject:** RE: Meeting Agenda - Warfarin Bait for Feral Hogs - 3-4 PM Today, Room 7671

Bill: Since there is no product chemistry issues for this product, I am not planning to attend the meeting. If some issues come up please call me at 703-308-9374 or send me the e-mail. Thank you very much.

shyam

**From:** Jacobs, William  
**Sent:** Thursday, April 14, 2016 11:59 AM  
**To:** Laws, Meredith <Laws.Meredith@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>; Grable, Melissa <Grable.Melissa@epa.gov>; Newcamp, Caitlin <Newcamp.Caitlin@epa.gov>; Wait, Monica <Wait.Monica@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>; Benbow, Gene <Benbow.Gene@epa.gov>; Mathur, Shyam <Mathur.Shyam@epa.gov>; Shah, Pv <Shah.Pv@epa.gov>; Donovan, Elizabeth <Donovan.Elizabeth@epa.gov>; Hawkins, Monica <Hawkins.Monica@epa.gov>; Sahafeyan, Mohsen <Sahafeyan.Mohsen@epa.gov>; Abdel-Saheb, Ibrahim <Abdel-Saheb.Ibrahim@epa.gov>  
**Subject:** Meeting Agenda - Warfarin Bait for Feral Hogs - 3-4 PM Today, Room 7671

See attachment.

## Jacobs, William

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**From:** Laws, Meredith  
**Sent:** Tuesday, April 05, 2016 8:59 AM  
**To:** Jacobs, William  
**Cc:** Suarez, Mark  
**Subject:** Warfarin hog bait

Bill – EFED is asking for a team meeting on the hog bait. New uses are supposed to have team meetings – did you have one when this came in?

EFED has questions so please set one up. Please invite me, Mark Suarez and Mark Corbin and the EFED reviewers, also HED staff. Below are some of EFED's questions.

Meredith

- The recommended frequency of “check-ins” is every 1 to 5 days at the feeder and 2 – 5 days for dead animals. I think we should perhaps recommend daily check-ins during the baiting period?
- The label doesn't prohibit location of these feeders from ag crop areas, although it says “avoid” placement near open crops. More of a human health issue, but placement of these feeders seems like it should be farther from cropped areas, in my mind.
- Should we propose a label statement along the lines of feeding stations must be X distance from water?



## PROPOSED AGENDA EPA MEETING

**Attendees on behalf of Scimetrics Ltd. Corp:** Richard Poché, Sue Valentine

**Proposed Date and Time:** End of March: March 29, 30 or 31  
Start time: 9 am or 9:30 am  
Duration: Approx. 45-60 minutes

**Location:** 2777 South Crystal Drive, Arlington VA

### Discussion Points:

#### Item 1

Update and preview of following experimental use permits and submissions for Feral Hogs:  
72500-EUP-2 (Kaput Feral Hog Bait)  
72500-EA (Kaput Hog-Gone, Section (3)(c) application currently in process)  
72500-EUP-3 (Kaput Feral Hog Cracked Corn Bait)

#### Item 2

Alternate [REDACTED] formulation for existing oat-based baits:  
72500-11 (Kaput Field Rodent Bait B)  
72500-24 (Kaput Ground Squirrel Bait)  
72500-ET (Kaput Combo Prairie Dog Bait)

#### Item 3

ASPCRO Letter dated 01.21.15 allowing addition of Target Pests for Mouse and Rat Baits without data submission

#### Item 4

Baits including imidacloprid (EPA Reg. Nos. 72500-11,-13,-14,-17,-18,-19,-24):  
Update/Eliminate verbiage "*If sufficient quantities of this bait are ingested, the use of this product may aid in the reduction of fleas that commonly infest listed rodent hosts....*"

\*Inert ingredient information may be entitled to confidential treatment\*



PO Box 1045 • Wellington, Colorado 80549-1045  
970-482-1330 Phone • 970-482-1885 Fax  
[www.kaputproducts.com](http://www.kaputproducts.com)

**Jacobs, William**

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**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Tuesday, January 12, 2016 4:54 PM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Kaput Hog-Gone with [REDACTED]

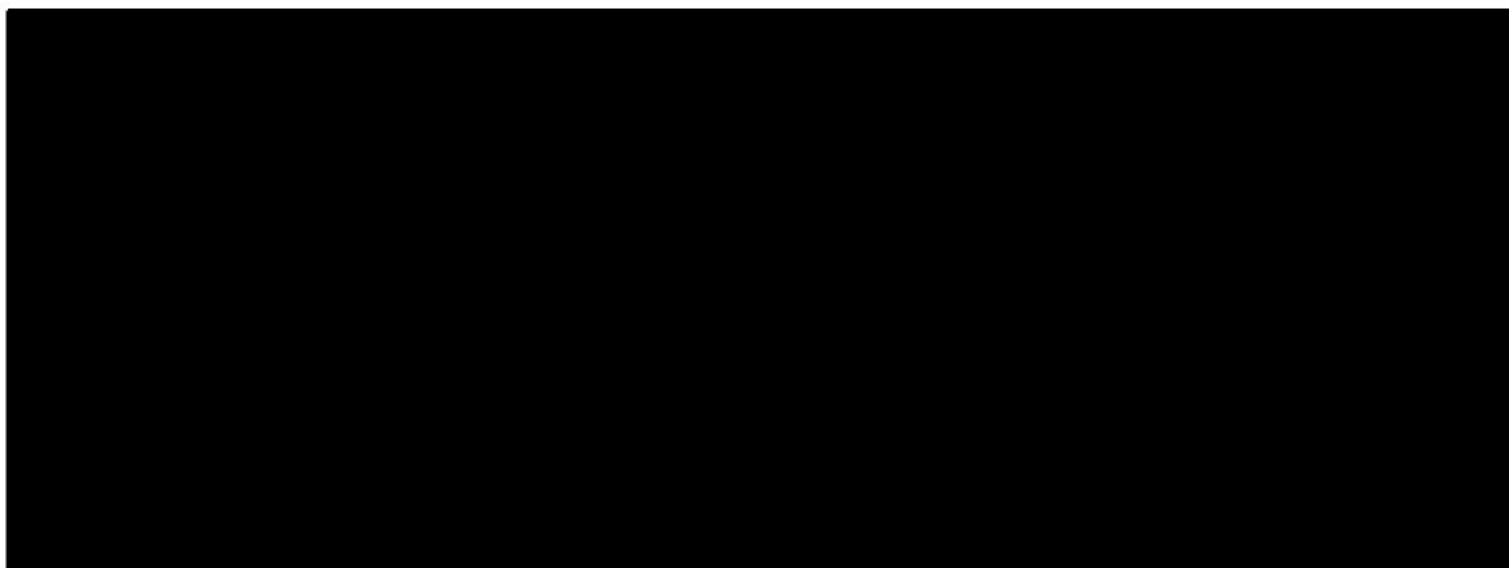
S 979666

**Re: Kaput HOG-GONE, EPA Symbol 72500-EA**

**Alternate Formulation CSF including [REDACTED]**

Bill:

In regards to your request for more information about the addition of [REDACTED] on the Alternate Formulation CSF for above listed submission:



Bill, if you need copies of the study, CSF's or batch records, please let me know. Any comments or suggestions, let me know as well. Thanks, Sue.

--

Sue Valentine  
Scimetrics Ltd. Corp.  
PO Box 1045  
Wellington, CO 80549  
Ph. 970-482-1330

# DATA PACKAGE BEAN SHEET

Date: 12-Jan-2016

Page 1 of 2

Decision #: 510475

DP #: (431103)

PRIA

Parent DP #:

Submission #: 976028

E-Sub #: 8829

## \*\*\* Registration Information \*\*\*

### Registration: 72500-EA - Kaput HOG-GONE

Company: 72500 - SCIMETRICS, LTD. CORPORATION

Risk Manager: RM 07 - Mark Suarez - (703) 305-0120 Room# PY1 S-9722

Risk Manager Reviewer: William Jacobs BJACOBS

Sent Date:

PRIA Due Date: 13-Feb-2017

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R230) NEW USE;OUTDOOR;NON-FOOD;

Ingredients: 086002, Warfarin(.005%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 12-Jan-2016

Due Back:

DP Ingredient: 086002, Warfarin

DP Title:

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: RD / CITAB

Last Possible Science Due Date: 17-Aug-2016

Team Name:

Science Due Date:

Reviewer Name:

Sub Data Package Due Date:

Contractor Name:

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

Please review the proposed CSF, label, cited product chemistry data, and claims of "Not Applicable Data Requirements" and determine whether the information provided is accurate and sufficient to support registration of this product.

DP#: (431103)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (510475)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1550/Product Identity and composition	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1600/Description of materials used to produce the product	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1620/Description of production process	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1650/Description of formulation process	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1670/Discussion of formation of impurities	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1700/Preliminary analysis	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1750/Certified limits	Pass (07-Apr-2014)
49314001		Valentine, S. (2014) Kaput Feral Hog Bait: Product Identity and Composition. Unpublished study prepared by Scimetrix, Ltd. Corporation. 17p.	830.1800/Enforcement analytical method	Pass (07-Apr-2014)
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.6302/Color	Pass (07-Apr-2014)
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.6303/Physical state	Pass (07-Apr-2014)
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.6304/Odor	Pass (07-Apr-2014)
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.6317/Storage stability	Pass (07-Apr-2014)
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.6320/Corrosion characteristics	Pass (07-Apr-2014)
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.7000/pH	Pass (07-Apr-2014)

DP#: (431103)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (510475)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
49314002		Polyakova, L. (2014) Kaput Feral Hog Bait: Determination of Color, Physical State, Odor, Storage Stability, Corrosion Characteristics, pH and Bulk Density. Project Number: 13008, 13/TS/08A. Unpublished study prepared by Genesis Laboratories, Inc. 23p.	830.7300/Density/relative density	Pass (07-Apr-2014)

### IRB EFFICACY REVIEW

PRODUCT NAME: KAPUT® FERAL HOG BAIT  
KAPUT® HOG-GONE

PRODUCT NUMBERS: 72500-EUP-2, 72500-EA

REGISTRANT: Scimetrix Ltd. Corp.  
Wellington, CO 80549

DATE COMPLETED: 3/29/2016

DP NUMBER: 431100

DECISION NUMBER: 510475

DATES OF SUBMISSION: EUP - 9/17/15 (received 9/18/15, sent for review 10/22/15)  
§3 – 10/21/15 (received 10/22/15, sent for review 1/12/16)

ACTIVE INGREDIENT: Warfarin

FORMULATION: 0.005% and 0.01% Warfarin bait blocks (72500-EUP-2)  
0.005% Warfarin bait blocks (72500-EA)


TYPE OF PRODUCT: Rodenticide

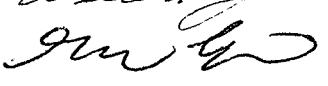
PURPOSE: Experimental field use of product in Texas (72500-EUP-2)  
Registration application for new use of Warfarin (72500-EA)

DATA MRID NUMBER: 497444-01

GLP CLAIMED: Yes

TEAM REVIEWER: William W. Jacobs, Ph. D.

EFFICACY REVIEWER: William W. Jacobs, Ph. D.  3/29/16

SECONDARY REVIEWER: Gene Benbow, M.S.  3/29/16

### BACKGROUND

This review assesses a field efficacy study involving 0.005% and 0.01% Warfarin bait-block formulations that were authorized for experimental use under the authority of §5 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. This review also assesses the same report in light of Scimetrix' application to register a 0.005% Warfarin bait-block product (File Symbol 72500-EA) under §3 of FIFRA. The pending §3 product would be used

to control only feral hogs (*Sus scrofa*) on rangeland, forests, non-crop areas and crop lands.

The text quoted above also appears in the first sentence of the "USE RESTRICTIONS:" subsection of the "DIRECTIONS FOR USE" section on both of the labels that were accepted for experimental use when 72500-EUP-2 was granted on 6/24/14. One label was accepted for each of the 2 bait formulations that were covered under the permit.

See efficacy reviews of 10/23/13 and 5/28/14 for discussions of the research and product formulations that ultimately were covered by 72500-EUP-2. 72500-EUP-2 expired on 6/24/15, one year after its issuance. Scimetrics originally had applied for permission to evaluate only a 0.005% Warfarin bait-block formulation. The company decided to add the 0.01% Warfarin bait to the research plan because EPA's assessment of the materials in the original EUP application had noted that the 0.005% concentration actually had not been evaluated in trials with captive feral hogs. The nominally 0.005% Warfarin bait that was used in limited efficacy screening was found via assay to have been 0.00712% Warfarin. (See the efficacy review of 10/23/13 and the document assigned MRID# 479502-03.)

The efficacy report assessed in this review constitutes the final report for 72500-EUP-2 and was submitted on 9/17/15.

On 10/21/15, Scimetrics submitted an application for a U.S. registration to control feral hogs. The final report to 72500-EUP-2 was among the documents that Scimetrics cited to support the application for 72500-EA.

## DATA SUMMARY

### Formulation

The CSFs for the 0.005% and the 0.01% Warfarin formulations that were used under 72500-EUP-2 both are dated "**May 22, 2014**". Those CSFs were discussed in a confidential attachment to the efficacy review of 5/28/14. The CONFIDENTIAL ATTACHMENT to this review discusses the composition of the bait formulations that were mixed for use under 72500-EUP-2.

The formulations summarized in the pending basic and alternate CSFs, dated October 21, 2015, related to the registration application for 72500-EA also are discussed in the CONFIDENTIAL ATTACHMENT to this review.

### Efficacy Data

The final report, submitted on 9/17/15 and assigned an MRID Number on 10/20/15, is cited and discussed below.

Franckowiak, G.A. (2015) Field efficacy of Kaput® Feral Hog Bait for controlling feral hogs (*Sus scrofa*) in Texas. Unpublished report, Study No. 15002, Genesis Laboratories, Inc., Wellington, CO, 349 pp., plus a 4-pp. confidential attachment.

MRID# 497444-01

This report describes the procedures used and the results obtained from the experimental field trials that Genesis Laboratories conducted under 72500-EUP-2 on behalf of Scimetrics, Ltd.

The study was conducted in a rural area that included parts of Floyd, Motley, and Briscoe Counties, Texas. The total treated area reportedly was "3953.68 acres (16 km<sup>2</sup>)" which also works out to about 6.2 mi<sup>2</sup>.

Two bait formulations were used in this trial. Scimetrics mixed the nominally 0.005% Warfarin bait batch ("lot # FH040115", designated "15-TS-02" by Genesis Laboratories) and the nominally 0.01% Warfarin bait batch ("FH040215", designated "15-TS-03" by Genesis) approximately one month before the date (5/1/15) when use of toxic bait was permitted under 72500-EUP-2.<sup>1</sup> These

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<sup>1</sup> Due to concerns regarding potential primary exposures of migrating whooping cranes, EPA concluded that use of toxic bait should be withheld until after any cranes that might migrate through the study would have headed north.

bait lots were large, with “approximately 1,927.7 kg of 0.005% warfarin bait and approximately 1,880.6 kg of 0.01% warfarin bait” -- >2 tons of each – having been received by Genesis.<sup>2</sup>

Scimetrics also mixed batches of a placebo for the toxic baits. Judging by the lot numbers (“PLAYFH30915” and “PLAFH031915”) assigned to the placebo batches, they were mixed a few days before the toxic bait, which would have been the correct order if the same equipment was used for all of these mixings. As it was used to condition hogs to accept bait blocks prior to introduction of toxic baits on the test plots, the placebo bait also was needed earlier in the research program than were the toxic baits.<sup>3</sup>

Franckowiak (2015) reports that the placebo bait was assayed for Warfarin contamination on 3/30/15 with no Warfarin having been detected. He also reports that the nominally 0.005% Warfarin bait was found to be “ $53.3 \pm 4.6$  ppm” (0.00533%) in 3 runs and that the nominally 0.01% Warfarin bait assayed at “ $107.6 \pm 2.3$  ppm” (0.01076%). These results were within reasonable ranges of the declared nominal concentrations for these formulations. “**Appendix B1**” to Franckowiak’s report describes the procedures used to assay bait. Tables and graphics of results appear in his “**Appendix B2**”, “**Appendix B3**”, and “**Appendix B4**”. These documents are consistent with the statements regarding bait assays that appear in the main text of the Franckowiak (2015) report. Limits of detection and quantitation were 4.00 µg/g (0.000400%) and 9.66 µg/g (0.000966%), respectively.

The “Placebo mix” used in this trial was a “50/50 mix ... of cracked corn and Placebo (bait without the active ingredient or blue indicator dye).”

Three research plots were established for this study. Two of these plots were nearly circular in shape. One of these plots (“T1”) was used for applying the 0.005% Warfarin bait, while the other (“T2”) was used for the 0.01% Warfarin bait. The third plot (“C”) deviated from circularity. That plot was baited only with Placebo mix during the period when toxic bait was used on the other two plots. The C plot was located geographically between the 2 treated plots.

Franckowiak (2015) provides the “Approximate plot epicenter” for each of these plots as follows: T1 (34°18'55.92"N, 101°3'804"W); C (34°17'42.27"N, 100°59'12.85"W); and T2 (34°16'50.58"N, 100°55'9.86"W). Franckowiak adds that

Study plots were approximately 8.0 km<sup>2</sup> (approximately 1976.84 acres) each in size, and varied in distance to one another due to landowner permission to carry out research on their land. Distance from T1 plot to Control plot was approximately 3.27 km; distance from Control plot to T2 was approximately 1.7 km. Treatment plots were assigned to designated plots by the assessments of hog activity and abundance, and all animals within the designated areas were included in treatment plots.

It may be that “landowner permission” issues ultimately affected the shape of the C plot, which originally was to be circular like the other two. (See efficacy review of 5/28/14 for 72500-EUP-E.) As the areas immediately around the C plot received essentially the same treatment (i.e., no Warfarin) as did the C plot itself, its irregular shape did not pose problems to experimental design, which would have been the case if either of the 2 poisoned plots had had an irregular shape.<sup>4</sup>

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<sup>2</sup> The total amount of each bait that was prepared for this trial was far below the 10,000 lbs of each formulation that were authorized under 72500-EUP-2.

<sup>3</sup> At my request, on 10/26/15, Sue Valentine of Scimetrics described the placebo blocks and the placebo mix that were used in Franckowiak’s (2015) field trial and submitted a batch sheet for the placebo blocks. See CONFIDENTIAL ATTACHMENT for further information on the placebo blocks

<sup>4</sup> The treatment designations for the plots that became known as “T1” and “C” were changed during the course of the preconditioning period. The “**BAIT DISPERSAL RECORD (Modified)**” forms for these two plots include the following handwritten note: “*Based on abundance of hogs, the plot numbers were changed to ensure maximum exposure to the TS ... 4/26/15*”.

Whether separations of about a little more than one and two miles between the C plot and the two poisoned plots provided sufficient isolation of treatments for feral hogs was not clear at the start of the project.

The 3 study plots included a variety of habitat and soil types, upon which Franckowiak reports in detail. The Quitaque Creek runs through the southern portions of all 3 plots. There were large areas planted to various crops within each of these plots. Cotton was the primary planted crop on all 3 plots, with areas planted to sorghum and wheat being present on T1, an area planted to wheat being present on T2, and areas planted to wheat peanuts and grass present on C. Figures 5-7 in Franckowiak's (2015) report suggests that many of the crop areas were set up for center-pivot irrigation. As unusually large amounts of rainfall hit the study area during the spring of 2015, irrigation might not have been necessary at the time of the study. Due to the rainfall, the Quitaque Creek was a much larger body of water in the spring of 2015 year than usually is the case (Richard Poché, **personal** communication).<sup>5</sup>

As outlined in the experimental program that Scimetrics submitted and amended during the course of the evaluation period for 72500-EUP-2 (efficacy reviews of 10/23/13 and 5/28/14), the basic research design called for presentation of bait in large metal dispensers which, when fully operational, were to limit direct access to bait compartments by species other than feral hogs. Bait stations were to be deployed on all 3 plots prior to the targeted time of baiting in order to condition animals to feed from them. Initially, the dispensers were to be loaded with cracked corn, with the researchers effecting a gradual transition from cracked corn to placebo 1"-cube bait blocks over time. Once hogs were visiting and feeding regularly from the dispensers, the units were to be activated so as to limit access to species other than hogs, with toxic bait then being loaded into the dispensers on the test plots. Franckowiak (2015) followed that basic design except that placebo mix was used as the only conditioning formulation.

Several types of bait dispensers were used. These included:

"20 Brower Equipment #22H double door feeders (Houghton, IA)"

"70 Miller Manufacturing #HGFD double door feeders (Glencoe, MN)";

"Two HogHopper™ (Animal Control Technologies Australia, Somerton, VIC 3062)"; and

One "Hog Stopper prototype" from "IMS machine shop (Plainview, TX)".

On the double-door dispensers, hogs were to access bait by lifting either of the low-level hinged lids to bait compartments thorough use of the snout. So as to exclude nontarget species, 10-lb weights were attached to the lids of those units.<sup>6</sup> The feeders were secured with stakes to keep them from being knocked over.

The double-door dispensers were distributed evenly among the study plots (i.e., 30 per plot). The T2 poisoned plot and either the T1 or the C plot also got a HogHopper™ dispenser, while the Hog

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<sup>5</sup> Climatological information appended to the Franckowiak (2015) report indicates that precipitation for the town of Turkey, TX, (near to the study area) in April of 2015 was more than double the "Normal" amount for that month and that total precipitation for May of 2015 in Turkey was 10.80", more than 3½ times "Normal". During the entire period of the field trial (3/19-6/9/15) the minimum and maximum ambient temperatures were 0°C (32°F) and 35.6°C (96°F). Field notes appended to the report indicate that rain and localized flooding affected research activities on some days.

<sup>6</sup> Franckowiak (2015) reports that trials with 15-lb weights added had showed that hogs would not lift bait dispenser doors open. It also seems possible that hogs would not go to the effort of opening lids with 10-lb weights added to them unless the hogs were especially hungry or the bait in the dispenser was especially attractive to them.

Stopper was used on either the C or the T1 plot.<sup>7</sup> The double-door dispensers were deployed in “clusters” consisting of 3 units each. Within clusters, dispensers were situated 3-6 feet from one another. Ten such clusters were arrayed on each study plot. The HogHopper™ and Hog Stopper units were deployed singly on their respective plots. According to Franckowiak,

Feeder stations were restricted to natural hog habitat (e.g., river bottom areas, wooded areas, areas of thick vegetation). No feeder stations were placed in open cropland or grassland.

“Figure 2”, “Figure 3”, and “Figure 4” to the Franckowiak (2015) report illustrate placement locations for bait dispenser clusters and isolated units on plots T1, T2, and C, respectively. Although some of these placements appear to be near to fields planted to crops, none of the placements appear to be within the crops themselves.

Depending on the specific plot and bait dispenser, the pre-exposure conditioning period began between 4/9/15 and 4/17/15 with the loading, typically, of ~22.8 kg (~50 lbs) of “placebo mix” into bait dispensers. These dispensers were reloaded with placebo mix if there was significant consumption from them. Many of the dispensers had little or no placebo mix taken from them during the preconditioning period. In some cases, the residual amount collected for weigh-back on 5/1/15 exceeded the amount originally loaded to the unit. Franckowiak (2015) attributes such increases to “heavy rainfall”, adding that “The contents of feeders were left to dry for up to 7 days if needed.” Whether fed from or not during preconditioning, the dispensers were loaded with their respective test materials at the start of the bait-exposure phase. On the T1 plot, one dispenser position (“T1 G-31”) was not loaded at all during the preconditioning phase. The feeder designated for that position at that time likely was the Hog Stopper as Franckowiak reports that unit to have been under construction during the preconditioning phase of the trial.

On 5/1/15 (typically), residual amounts of placebo mix were collected and weighed back (to the nearest 0.1 kg -- ~46 g) to contribute to the calculation of pretreatment consumption, and toxic baits were loaded into the dispensers on the T1 and T2 plots. Previously unused (presumably) placebo mix was loaded into the dispensers on the C plot. The double-door stations (30 of 31 units on each plot) were loaded with 10.2 kg of bait rather than the 22.8 kg each that had been used during the pre-treatment period. The HogHoppers, on the T1 and T2 plots, were loaded with 20.4 kg of toxic bait each. The Hog Stopper station on the C plot was loaded with 22.8 kg of Placebo mix for the treatment phase.

The post-treatment census period began on 5/30/15 for the T1 plot (0.005% Warfarin), on 5/31/15 for the T2 plot (0.01% Warfarin), and on 6/1/15 for the C plot (Placebo mix). The double-door dispensers were loaded with 10.2 kg of bait each (<½ of the 22.8 kg placed in them at the start of the pretreatment period). Use of less census ration for the post-treatment period than was used for the pre-treatment period introduced a bias favoring the appearance of product effectiveness into the study design, although very little placebo mix actually was taken during the post-treatment period. The 2 HogHoppers and the Hog Stopper all were loaded with 22.8 kg of Placebo mix for the post-treatment period. Bait dispensers were checked for consumption of Placebo mix 4 days into the post-treatment phase and again “on the day of removal.”

The “day of removal” for the post-treatment phase was 8 days after that phase of the trial began.

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<sup>7</sup> The text of Franckowiak’s (2015) report states that the Hog Stopper was used on the C plot. Field notes indicate that the feeder position that did not get prebaited was “T1-31” which, due to reassignment of the plots to treatments, originally would have been “C-31”. However, the notation “Hoghopper –GAF 9-11-15” appears on the field form for position “T1 G-31”. That form also shows “Hog Stopper” as the “Feeder Type”, so it might have been that the intended positions of the Hog Stopper and a Hog Hopper were exchanged when the plot designations were switched. For this review, it is assumed that such was the case.

The pre-treatment period on the T1 plot (0.005% Warfarin) lasted 18 days (4/11-29/15). On the T2 plot (0.01% Warfarin), the pre-treatment period lasted 21 days (4/9-30/15). On the C1 plot (placebo mix), the pretreatment period apparently ran from 4/10-5/1/15, also about 3 weeks. The treatment periods apparently lasted 28, 29, and 29 days for the T1, T2, and C plots, respectively, and the post-treatment phase lasted just over a week. The post-treatment monitoring periods ran from 5/30/15 to 6/7/15 for the T1 plot, from 5/31/15 to 6/8/15 for the T2 plot, and from 6/1/15 to 6/9/15 for the C plot.

As consumption of placebo mix from the same units that were used to dispense toxic bait was used as an index to the success of this experimental trial, the data obtained in this regard must be adjusted for the differences in durations of pretreatment and post-treatment periods for all plots and the differences in durations of pretreatment periods among plots. Other complications include differences in times of deployment of some of the dispensers during pretreatment periods, differences in the amounts of bait used to load dispensers during the pretreatment and post-treatment periods, the fact that most recorded consumption came from a small minority of the units used in the trial, and the frequent occurrence of negative consumption (more feed at the end of the exposure period than reportedly was put out) during the pretreatment phase. Weighings of diets placements and recoveries were taken to the nearest 0.1 kg (100 g). Weighings of spillage recovered around bait dispensers were taken to the nearest 0.1 g.

The other indices to study success (i.e., census methods) used in this trial were visitations to feeder stations, a passive tracking index (discussed in prior efficacy reviews for 72500-EUP-2), and the fates of feral hogs that had been live-trapped and equipped with transmitters (either VHF transmitters or GPS tracking devices).

Visitations to feeder stations were recorded via motion-sensing cameras deployed during the pretreatment and baiting periods. Ten cameras were used per study plot. These cameras were deployed in the vicinity of bait dispensers, likely at the clusters of double-door units. The results from the pre-treatment index were compared to data collected well into the treatment phase ("mid-treatment"), by which time some effects of the poisoning effort were apparent.

Beginning at the sighting of the first hog on camera during the census period, hog counts were summed for every 30 minute timeframe. The photo with the most hogs present was used for the census for every 30 minute timeframe, and if it was clear that additional hogs moved to the feeder site, they were summed and used for the count.

It seems that the aim here was to obtain a maximum count of the number of individual hogs at the camera site.

For the passive tracking index, nine census areas ~ 1.2 m (~ 4') wide and 333.3 m (~1093' or 364 yards) long in sandy soil were created on each plot for the purpose of detecting hogs' hoof prints. After having been "dragged smooth, using weighted chin-link fencing pulled by a vehicle", the areas were assessed 24 hours later to determine whether any hog tracks had been left on them. The areas then were smoothed once more and "observed again at 48 and 72 hours after the initial smoothing". The index was considered to be passive because the plots were not directly associated with other stimuli deliberately or fortuitously situated so as to attract hogs. Rather, the plots were intended to intercept hogs in their normal travels.

The passive tracking index was employed only during the pretreatment and "mid-treatment" periods of the study.

Franckowiak and his coworkers also used radio telemetry as an index for assessing bait effectiveness and for locating carcasses of poisoned hogs. From 3/22/15 through 4/30/15, hogs were live-trapped and equipped either with VHF ear tags or with collars bearing GPS equipment. Use of the collars was limited to relatively large individuals. Hogs trapped early in this time period also were equipped with two ear tags, one of which identified the animal by number and the other

of which bore the admonition "Do Not Eat". Animals trapped near the end of the pre-treatment phase of the study were not ear-tagged, however, due to concern that doing so "could play a role in inducing bleeding for treated hogs."

Franckowiak (2015) reports that carcass searches in and near treated plots were conducted "in a systematic manner at regular intervals" beginning after the toxic baits were deployed and ending with the conclusion of the post-treatment observation period.

Observations were made while traveling through and in close proximity of each plot, scanning fields, ditches, roads and pasture ground for nontarget species carcasses. Personnel also swathed through large areas of each plot to find and collect carcasses of animals found dead from the test substance. Hazard search efforts took place on foot, with an All-Terrain Vehicle (ATV), and also with 4x4 trucks. Any moribund animals that were found were not handled, moved, nor euthanized, since such activities could interfere with the assessment of product efficacy and secondary hazards. Carcass locations were estimated by handheld GPS devices and were recorded on hazard search forms.

Tissue samples from many hog carcasses were taken for residue analyses. All or most of 12 hog carcasses were left in place in the field to assess scavenging activities "and condition of the hog carcass over time".

Tissue residue analyses were performed by Genesis at its laboratory in Wellington, CO.

For the 0.005% Warfarin, 0.01% Warfarin, and check (not-poisoned) plots, respectively, Tables 1, 2, and 3 to this review summarize deployment, recovery, and calculated consumption of placebo mix and toxic baits during the pretreatment, treatment, and post-treatment phases of this study.<sup>8</sup> The figures presented for the individual bait dispensers were taken from raw data sheets appended to Franckowiak's (2015) report at pages 123 to 153 and 169 to 230. As reported in the text of the report, the amounts of bait applied during the treatment phase, including replenishments, were 418.0 kg (~920 lbs) in the plot (T-1) treated with the 0.005% Warfarin bait, 356.6 kg (~785 lbs) on the plot (T-2) treated with the 0.01% Warfarin bait, and 328.8 kg (~723 lbs) on the plot (C) treated with placebo mix. Franckowiak calculates that the treatment rates for plots T-1, T-2, and C, respectively, were 0.466 lbs/acre, 0.3977 lbs/acre, and 0.3667 lbs/acre.<sup>9</sup>

As reported by Franckowiak and presented in Tables 1 and 2, 466.3 g of spilled bait were recovered on plot T-1, with another 210.1 g of spillage having been recovered on plot T-2. These amounts represent about 0.11% and 0.059%, respectively, of the amounts of bait applied to those plots. However, spillage was not monitored daily after the first 5 days of treatment (5/6/15) and was not monitored again for many units for the remainder of the baiting period, which ended on 5/29/15 or 5/30/15, depending upon the plot. Much of the spillage on T-2 was detected in the few reported visits to dispensers that occurred after 5/6/15. The largest amounts of spillage detected for any visit to a single bait dispenser were 89.8 g (for unit T1-12 on 5/4/15) and 59.2 g for unit T2-23 on 5/10/15, which was 4 days after the last prior visit to that unit. Spillage was not monitored on plot C.

The rather precipitous drop in take of toxic bait after the first several days of baiting persuaded study personnel to shorten the bait-exposure period to 4 weeks. They also shortened the post-exposure monitoring period to about a week.

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<sup>8</sup> In cases where the amount of feed remaining in a hopper exceeded the amount placed into it, Franckowiak recorded the consumption "as 0 kg because of uncertainty in estimates." That practice was followed in preparing Tables 1, 2, and 3 for this review.

<sup>9</sup> These numbers come from Franckowiak's (2015) "Table 2" ("Page 34 of 349"). Rounded figures appear elsewhere in the report.

For post-treatment census baiting, 10.2 kg of placebo mix were loaded into 30 of the bait hoppers and 22.8 kg were loaded in to the 31<sup>st</sup> hopper on each plot. Thus, the total amount of placebo mix initially presented was 328.8 kg per plot. There were no replenishments of any of the hoppers during the post-treatment phase.

Because the durations of the pre- and post-treatment periods differed, Tables 1, 2, and 3 to this review compare consumption of placebo mix prior to and following the bait-exposure period using an index of consumption/unit/day. According to this index, feeding on placebo mix decreased by 97.6% and 95.1%, respectively, on the plots where the 0.005% and 0.01% Warfarin baits were used, whereas “post-treatment” activity increased by 62.0% on the monitored untreated plot.

Franckowiak’s (2015) efficacy estimate related to consumption of placebo mix during the pre- and post-treatment periods was based on consumption per week. Using that index resulted in slightly different estimates than those shown in Tables 1, 2, and 3 to this review, which are based upon consumption per unit per day as feeder units were not all deployed for an even number of weeks on all plots during both census periods. Using the consumption/week index, Franckowiak calculated decreases in placebo mix take of 97.77% for the T1 plot (0.005%R Warfarin) and 96.23% (0.01% Warfarin), whereas consumption increased by 48.98% on the C plot. The consumption/week and consumption/unit/day indices both suggest big drops in hog interest in feeders on treated plots. Given that hogs were being poisoned there, such decreases would be consistent with effective treatments. The increase in take per unit time on plot C could have been due to complete isolation of the hog population using that site from the populations using the treated ones, a shift in preferred foraging location among the hogs remaining in the study area, growth in number and/or appetite of hogs in the area of plot C, and/or other factors.

The passive tracking index (PTI) was not used in the post-treatment period. Rather, Franckowiak conducted a pre-treatment census (while placebo premix was exposed in the feeders) and a “mid-treatment” census (while toxic bait still was in the feeders on the treated plots). The pre-treatment census period ran from 4/18/15 to 4/21/15, with the plots having been initially dragged on 4/18/15 and checked on the next 3 consecutive days. The “mid-treatment” census period ran from 5/24/15 through 5/27/15 and, thus, began more than 3 weeks after the initial use of toxic baits. This experimental design issue aside, the availability of the PTI as a useful index was thwarted in this study by the reported complete absence of hog tracks in the sampled areas of the T1 plot during the pre-treatment census period and perhaps during the “mid-treatment” census as well.<sup>10</sup> Franckowiak reports PTI increases of 11.92% and 90.18% for the T2 and C plots, respectively.

Franckowiak also used pre-treatment and “mid-treatment” census periods for his index based upon visits by hogs to feeders as determined from images captured on trail cameras. The pretreatment census ran from 4/17/15 through 4/21/15, during which time 1 hog was counted at feeders on the C plot, 311 hogs were counted on the T1 plot, and 42 hogs were counted on the T2 plot.<sup>11</sup> During the “mid-treatment” census period, 2 hogs were counted on the C plot (a “100%” increase), 4 were counted on T1 (a 98.7% decrease from pre-treatment), and 1 was counted on T2 (a 97.6% decrease).

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<sup>1010</sup> On “Page 26 of 349”, Franckowiak (2015) reports “0 hog tracks” for the T1 plot during both census periods but also presents a non-zero index of 0.407 for the “mid-treatment” period. Field forms on pages 261 and 267 of the report confirm the 0 total for the pre-treatment census period but show 11 total tracks among 6 tracking areas on the T1 plot for the third day of the “mid-treatment” census. If correct, the 11 tracks in the “mid-treatment” census would represent an infinite PTI increase from the pre-treatment census.

<sup>11</sup> As previously noted, the discrepant number of hogs seen at feeders led to the designation for the plot with one hog detected during the pre-treatment index being switched from “T1” to “C” and the designation for the original “C” plot being switched to “T1”.

Of the 61 feral hogs initially equipped with radio transmitters, 50 remained alive with working transmitters attached when use of Warfarin commenced on 5/1/15 (Table 4). Several of the remaining 50 tagged hogs were shot during the treatment period. Of those 50, one T2 animal reportedly showed evidence of blue dye and, consequently, was counted by Franckowiak (2015) as a Warfarin victim. Including that animal, 8 of 15 (53%) hogs with functioning radios and not adjusted out of consideration for efficacy evaluation were counted as having been taken by the 0.01% Warfarin bait. On the T1 plot, all 14 (100%) of the tagged hogs that remained under consideration were found dead with Warfarin, presumably from the 0.005%-a.i. bait, having been implicated. If the dye-tainted hog that was shot to death were excluded from the results for T2, the results would be 50% Warfarin-kill for the 0.01% Warfarin bait and 100% kill for the 0.005% Warfarin bait.

If the relative results had been the other way around (i.e., a much higher percent kill with the 0.01% concentration than with 0.005% Warfarin), it would be tempting to conclude that the 0.01% level was needed. While such a conclusion might have been overdrawn from such a limited sample – one plot per treatment – it seems unlikely that the reported results mean that the 0.01% concentration only is about half as effective as 0.005%. As the two treatments were miles apart, it seems safe to infer that both baits killed some hogs. Beyond that, it could be speculated or possibly confirmed through available tracking data that there was greater site fidelity among the T1 pigs and, consequently, a greater likelihood that they would visit the feeders there.

In addition to the 22 Warfarin-related deaths of transmitter-equipped hogs, Franckowiak reports that the field research team found 7 more carcasses of hogs that showed evidence of having been poisoned with the test materials.

The first apparently Warfarin-poisoned hog found during the treatment period were 4 T1 found on 5/7/15, 6 days after toxic bait was applied. Field notes from that day ("Page 235 of 349") indicate that "*blue scat as well as alive, active hogs were seen.*" One of the dead hogs was a piglet that "*showed no signs of warfarin consumption*" and was judged to be "*too small for liver sample collection*" ("Page 236 of 349").

Trail cameras oriented toward bait dispensers captured images of nontarget species in addition to feral hogs. Franckowiak (2015) notes that visiting of feeders by nontarget species

was primarily assessed during the pre-treatment period when testing multiple weight loads on feeder lids in attempts to restrict access to raccoons, but allowing feral hogs to feed. Assessments of non-target species visitation during the treatment period were minimal as cameras were affected by inclement weather, and alternative food sources may have discouraged non-target species from seeking presented food.

The 10-lb weights added to the lids of the bait compartments reportedly kept "nearly all" [non-target species] but "very large raccoons, from accessing feed in the double-door feeders." Using 15-lb weights reportedly excluded hogs as well as raccoons.

Franckowiak states that placebo mix spilled during the preconditioning phase "was typically consumed by smaller hogs" but reports that raccoons, deer, cottontail rabbits, woodrats, and birds also fed upon spillage. Considering these observations, the infrequency of monitoring, and field circumstances in general, it seems highly likely that much more than the 676.4 g of test materials recovered as spillage actually was spilled during that toxic baiting phase.

A dead raccoon was found on the T2 plot search on 5/15/15. That carcass was examined and reportedly had "*no sign of dye*" ("Page 258 of 349").

Franckowiak reports that hog carcasses left out in the study area were fed upon by various types of vertebrate animals, most commonly by coyotes, feral hogs, turkey vultures, and crows, as well

as by maggots. The maximum numbers of detections for vertebrate scavengers for any one indexed day were 12 for coyotes, 26 for turkey vultures, 22 for crows, and 24 for feral swine.

Liver tissues collected from hog carcasses were assayed for Warfarin content. All 13 of the liver samples taken from the T1 plot (0.005% Warfarin) tested positive (mean = 3.69 ppm; SD = 1.70 ppm; range = 0.42-5.57 ppm). All 9 samples from the T2 plot (0.01% Warfarin) also tested positive (mean = 2.89 ppm; SD = 2.35 ppm; range = 0.93-8.06 ppm). The one liver sample taken from the C plot did not have a detectable Warfarin residue.

The Franckowiak (2015) study demonstrates that bait concentrations of Warfarin well below the 0.025% level commonly used in products registered to control commensal rats and mice can kill feral hogs. Such a finding is not entirely surprising considering the relative sensitivity of swine to Warfarin (e.g., Timm, 1994). Although only one plot per bait concentration was used, Franckowiak's results indicate that the 0.005% Warfarin concentration will fatally poison feral hogs and do not include any evidence suggesting that using the a higher concentration of active ingredient (e.g., 0.01%) would be better for that purpose.

#### Label

The labels for the 0.005% Warfarin product proposed for §3 registration (72500-EA). From the standpoint of efficacy, there would be little reason to alter the proposed text at this time except with respect to the designations for use sites. The sites where Franckowiak (2015) deployed bait stations included "natural hog habitat (e.g., river bottom areas, wooded areas, areas of thick vegetation)" and did not include "open cropland or grassland." The specific locations where stations were used could be judged to come under the umbrellas of "forests" and "non-crop areas", but the latter expression seems overly broad. Terms like "river bottom areas" and "areas of thick vegetation" also are fairly broad; but they at least suggest habitat types. Such habitats would be likely to be relatively rich in variety of nontarget species in addition to being attractive to hogs.

#### CONCLUSIONS

1. The "**FINAL REPORT**" to 72500-EUP-E (Franckowiak, 2015, MRID No. 497444-01) also was submitted to support the application to register KAPUT HOG-GONE, EPA File Symbol 72500-EA under §3 of FIFRA. This report finds the study to demonstrate that a bait formulated like basic formulation for the 72500-EA product is proposed to be was capable of fatally poisoning feral hogs when used in the manner that is proposed on the pending label for that product. Submission of the "**FINAL REPORT**" also fulfills the permittee's obligation under 72500-EUP-2.
2. The use sites proposed on the pending label for this product should be evaluated for clarity and suitability after the technical reviews from all disciplines have been completed.

#### REFERENCE

Timm, R.M (1994) Description of active ingredients. In: Prevention and Control of Wildlife Damage (S.E. Hyngstrom, R.M. Timm, and G.E. Larson, eds.), University of Nebraska Cooperative Extension, U.S. Department of Agriculture, Great Plains Agricultural Council Wildlife Committee, G-23 to G-61.

Table 1. Prebait and bait removal from plot where 0.005% Warfarin blocks were used.

Unit #	Pretreatment				Treatment					Post-treatment			
	Kg Placed	Kg Added	Kg at End	Kg Removed*	Kg Placed	Kg Added	Kg at End	Kg Removed	g Spillage	Kg Placed	Kg Added	Kg at End	Kg Removed
T1-01	22.8	0.0	23.0	0.0	10.1	0.0	9.8	0.3	0.0	10.2	0.0	10.1	0.1
T1-02	22.8	0.0	23.0	0.0	10.1	0.0	10.1	0.0	0.0	10.2	0.0	10.2	0.0
T1-03	22.8	0.0	10.1	12.7	10.2	10.3	10.7	9.8	13.4	10.2	0.0	9.9	0.3
T1-04	22.8	0.0	10.1	12.7	10.2	10.1	6.2	14.1	20.3	10.2	0.0	9.3	0.9
T1-05	22.8	0.0	8.2	14.6	10.2	10.2	5.1	15.3	7.8	10.2	0.0	10.0	0.2
T1-06	22.8	68.4	23.8	67.4	10.2	0.0	2.5	7.7	47.0	10.2	0.0	10.0	0.2
T1-07	22.8	68.4	24.5	66.7	10.2	0.0	5.2	5.0	2.7	10.2	0.0	9.7	0.5
T1-08	22.8	68.4	23.4	67.8	10.2	0.0	5.5	4.7	6.7	10.2	0.0	10.2	0.0
T1-09	22.8	0.0	7.5	15.3	10.2	0.0	7.2	3.0	3.2	10.2	0.0	10.0	0.2
T1-10	22.8	0.0	9.2	13.6	10.2	0.0	7.9	2.3	4.6	10.2	0.0	10.0	0.2
T1-11	22.8	0.0	7.2	15.6	10.2	0.0	6.3	3.9	43.3	10.2	0.0	10.1	0.1
T1-12	22.8	0.0	0.0	22.8	10.1	0.0	3.5	6.6	116.3	10.2	0.0	10.2	0.0
T1-13	22.8	0.0	0.1	22.7	10.2	0.0	4.4	5.8	54.5	10.2	0.0	10.0	0.2
T1-14	22.8	0.0	3.7	19.1	10.2	0.0	3.0	7.2	59.0	10.2	0.0	10.0	0.2
T1-15	22.8	0.0	6.3	16.5	10.2	20.4	11.5	19.1	14.8	10.2	0.0	10.1	0.1
T1-16	22.8	0.0	4.3	18.5	10.2	20.4	11.9	18.7	3.3	10.2	0.0	10.2	0.0
T1-17	22.8	0.0	10.2	12.6	10.2	20.4	10.5	20.1	10.1	10.2	0.0	10.2	0.0
T1-18	22.8	0.0	23.6	0.0	10.3	0.0	6.6	3.7	17.4	10.2	0.0	10.2	0.0
T1-19	22.8	0.0	24.4	0.0	10.2	0.0	9.5	0.7	20.4	10.2	0.0	10.2	0.0
T1-20	22.8	0.0	23.2	0.0	10.2	0.0	9.1	1.1	21.5	10.2	0.0	10.2	0.0
T1-21	22.8	22.8	8.9	36.7	10.2	0.0	10.0	0.2	0.0	10.2	0.0	10.2	0.0
T1-22	22.8	22.8	10.3	35.3	10.1	0.0	10.1	0.0	0.0	10.2	0.0	10.2	0.0
T1-23	22.8	22.8	12.6	33.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
T1-24	22.8	0.0	23.3	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.0	0.2
T1-25	22.8	0.0	24.7	0.0	10.3	0.0	10.3	0.0	0.0	10.2	0.0	10.1	0.1
T1-26	22.8	0.0	26.0	0.0	10.2	0.0	10.1	0.1	0.0	10.2	0.0	10.1	0.1
T1-27	22.8	0.0	25.5	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
T1-28	22.8	0.0	24.3	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
T1-29	22.8	0.0	24.6	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
T1-30	22.8	0.0	23.9	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
T1-31	n/a	n/a	n/a	-----	20.4	0.0	19.8	0.6	0.0	22.8	0.0	21.0	1.8
TOTALS	684.0	273.6	469.9	503.6	326.2	91.8	268.0	150.0	466.3	328.8	0.0	323.2	5.6
kg/Unit	22.80	9.12	15.66	16.26	10.52	2.96	8.65	4.84	15.04	10.61	0.00	10.43	0.18
kg/Unit/day	1.28	0.51	0.88	0.94	0.38	0.11	0.31	0.17	0.54	1.33	0.00	1.12	0.02
% Change													-97.6%

\*In cases where the amount remaining exceeds the amount offered, a value of zero is inserted rather than a calculated negative figure.

Table 2. Prebait and bait removal from plot where 0.01% Warfarin blocks were used.

Unit #	Pretreatment				Treatment					Post-treatment			
	Kg Placed	Kg Added	Kg at End	Kg Removed*	Kg Placed	Kg Added	Kg at End	g Removed	g Spillage	Kg Placed	Kg Added	Kg at End	Kg Removed
T2-01	22.8	0.0	0.0	22.8	10.2	0.0	2.6	7.6	10.9	10.2	0.0	10.1	0.1
T2-02	22.8	0.0	0.0	22.8	10.2	0.0	2.9	7.3	17.2	10.2	0.0	7.6	2.6
T2-03	22.8	0.0	0.0	22.8	10.2	0.0	10.2	0.0	7.2	10.2	0.0	10.1	0.1
T2-04	22.8	0.0	16.6	6.2	10.1	10.2	11.7	8.6	0.0	10.2	0.0	10.1	0.1
T2-05	22.8	0.0	8.1	14.7	10.2	10.2	10.5	9.9	21.6	10.2	0.0	10.1	0.1
T2-06	22.8	0.0	7.2	15.6	10.2	10.2	14.0	6.4	0.4	10.2	0.0	10.1	0.1
T2-07	22.8	22.8	18.2	27.4	10.2	0.0	6.2	4.0	0.7	10.2	0.0	10.0	0.2
T2-08	22.8	22.8	10.1	35.5	10.2	0.0	2.7	7.5	3.1	10.2	0.0	10.1	0.1
T2-09	22.8	22.8	5.0	40.6	10.2	0.0	2.4	7.8	9.8	10.2	0.0	10.1	0.1
T2-10	22.8	0.0	22.6	0.2	10.2	0.0	9.6	0.6	0.0	10.2	0.0	10.1	0.1
T2-11	22.8	0.0	15.9	6.9	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
T2-12	22.8	0.0	20.5	2.3	10.1	0.0	9.2	0.9	0.0	10.2	0.0	10.1	0.1
T2-13	22.8	0.0	21.7	1.1	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
T2-14	22.8	0.0	26.1	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
T2-15	22.8	0.0	25.6	0.0	10.2	0.0	10.0	0.2	0.0	10.2	0.0	10.1	0.1
T2-16	22.8	0.0	16.7	6.1	10.2	0.0	10.2	0.0	3.3	10.2	0.0	10.1	0.1
T2-17	22.8	0.0	16.7	6.1	10.1	0.0	10.1	0.0	0.5	10.2	0.0	10.1	0.1
T2-18	22.8	0.0	18.0	4.8	10.1	0.0	8.8	1.3	7.2	10.2	0.0	9.3	0.9
T2-19	22.8	0.0	13.1	9.7	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
T2-20	22.8	0.0	20.6	2.2	10.1	0.0	9.6	0.5	0.0	10.2	0.0	10.2	0.0
T2-21	22.8	0.0	21.3	1.5	10.2	0.0	10.2	0.0	0.0	10.2	0.0	9.9	0.3
T2-22	22.8	0.0	13.9	8.9	10.3	0.0	10.1	0.2	12.3	10.2	0.0	10.0	0.2
T2-23	22.8	0.0	23.1	0.0	10.1	0.0	9.6	0.5	60.5	10.2	0.0	10.2	0.0
T2-24	22.8	0.0	22.8	0.0	10.1	0.0	9.5	0.6	0.0	10.2	0.0	10.0	0.2
T2-25	22.8	0.0	10.1	12.7	10.2	0.0	6.9	3.3	2.0	10.2	0.0	10.2	0.0
T2-26	22.8	0.0	1.6	21.2	10.3	0.0	6.4	3.9	3.7	10.2	0.0	9.8	0.4
T2-27	22.8	0.0	5.3	17.5	10.3	0.0	7.3	3.0	17.5	10.2	0.0	10.0	0.2
T2-28	22.8	0.0	30.7	0.0	10.2	0.0	9.8	0.4	0.0	10.2	0.0	10.2	0.0
T2-29	22.8	0.0	22.8	0.0	10.2	0.0	10.1	0.1	0.7	10.2	0.0	10.1	0.1
T2-30	22.8	0.0	22.6	0.2	10.2	0.0	9.8	0.4	0.0	10.2	0.0	10.1	0.1
T2-31	22.8	68.4	11.3	79.9	20.4	0.0	17.1	3.3	31.5	22.8	0.0	22.3	0.5
TOTALS	706.8	136.8	468.2	389.7	326.0	30.6	278.3	78.3	210.1	328.8	0.0	321.5	7.3
kg/Unit	22.80	4.41	15.10	12.57	10.52	0.99	8.98	2.53	6.78	10.61	0.00	10.37	0.24
kg/Unit/day	1.09	0.21	0.72	0.60	0.36	0.03	0.31	0.09	0.24	1.33	0.00	1.30	0.03
% Change													-95.1%

\*In cases where the amount remaining exceeds the amount offered, a value of zero is inserted rather than a calculated negative figure.

Table 3. Placebo Mix removal from plot where no toxic bait was used.

Unit #	Pretreatment				Treatment					Post-treatment			
	Kg Placed	Kg Added	Kg at End	Kg Removed*	Kg Placed	Kg Added	Kg at End	Kg Removed	g Spillage	Kg Placed	Kg Added	Kg at End	Kg Removed
C-01	22.8	0.0	22.4	0.4	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-02	22.8	0.0	22.8	0.0	10.2	0.0	9.5	0.7	0.0	10.2	0.0	10.1	0.1
C-03	22.8	0.0	22.1	0.7	10.2	0.0	9.8	0.4	0.0	10.2	0.0	10.2	0.0
C-04	22.8	0.0	23.2	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-05	22.8	0.0	23.4	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
C-06	22.8	0.0	25.8	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-07	22.8	0.0	22.7	0.1	10.2	0.0	9.7	0.5	0.0	10.2	0.0	9.9	0.3
C-08	22.8	0.0	22.2	0.6	10.2	0.0	10.0	0.2	0.0	10.2	0.0	9.1	1.1
C-09	22.8	0.0	22.8	0.0	10.2	0.0	9.9	0.3	0.0	10.2	0.0	10.2	0.0
C-10	22.8	0.0	24.1	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
C-11	22.8	0.0	26.8	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
C-12	22.8	0.0	24.9	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-13	22.8	0.0	22.9	0.0	10.2	0.0	4.5	5.7	0.0	10.2	0.0	3.2	7.0
C-14	22.8	0.0	24.0	0.0	10.2	0.0	5.9	4.3	0.0	10.2	0.0	6.6	3.6
C-15	22.8	0.0	21.3	1.5	10.2	0.0	10.2	0.0	0.0	10.2	0.0	5.4	4.8
C-16	22.8	0.0	11.1	11.7	10.2	0.0	3.2	7.0	0.0	10.2	0.0	3.3	6.9
C-17	22.8	0.0	13.0	9.8	10.2	0.0	7.3	2.9	0.0	10.2	0.0	4.0	6.2
C-18	22.8	0.0	15.0	7.8	10.2	0.0	5.3	4.9	0.0	10.2	0.0	4.0	6.2
C-19	22.8	0.0	8.6	14.2	10.2	0.0	5.9	4.3	0.0	10.2	0.0	10.0	0.2
C-20	22.8	0.0	8.3	14.5	10.2	0.0	2.4	7.8	0.0	10.2	0.0	3.4	6.8
C-21	22.8	0.0	5.0	17.8	10.2	0.0	2.6	7.6	0.0	10.2	0.0	3.7	6.5
C-22	22.8	0.0	9.9	12.9	10.2	0.0	8.8	1.4	0.0	10.2	0.0	10.1	0.1
C-23	22.8	0.0	22.3	0.5	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.1	0.1
C-24	22.8	0.0	23.4	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	9.5	0.7
C-25	22.8	0.0	23.9	0.0	10.2	0.0	9.3	0.9	0.0	10.2	0.0	10.2	0.0
C-26	22.8	0.0	23.4	0.0	10.2	0.0	8.8	1.4	0.0	10.2	0.0	10.1	0.1
C-27	22.8	0.0	16.3	6.5	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-28	22.8	0.0	24.7	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-29	22.8	0.0	26.1	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-30	22.8	0.0	22.9	0.0	10.2	0.0	10.2	0.0	0.0	10.2	0.0	10.2	0.0
C-31	22.8	0.0	18.2	4.6	22.8	0.0	20.3	2.5	0.0	22.8	0.0	22.4	0.4
TOTALS	706.8	0.0	623.5	103.6	328.8	0.0	276.0	52.8	0.0	328.8	0.0	277.4	51.4
kg/Unit	22.80	0.00	20.11	2.69	10.61	0.00	8.90	1.70	0.00	10.61	0.00	8.95	1.66
kg/Unit/day	1.09	0.00	0.96	0.13	0.36	0.00	0.30	0.06	0.00	1.33	0.00	1.12	0.21

62.0%

\*In cases where the amount remaining exceeds the amount offered, a value of zero is inserted rather than a calculated negative figure.

Table 4. Fates of feral hogs equipped with radio transmitters.

	C	Plot No. T1	T2	TOTALS
Warfarin Concentration Used (nominal)	none	0.005%	0.01%	
Total Number of Hogs Equipped with Transmitters	14	21	26	61
Number Lost to Study During Pretreatment*	3	5	3	11
Number Alive with Working Transmitters at Start of Treatment	11	16	23	50
Number Losing Transmitter During Treatment Period	1	2	4	7
Number Killed (Shot) or Found Dead - Other Causes	4	0	4	8
Adjusted Pretreatment Total (minus lost transmitters + killed/found dead)	6	14	15	35
Number of Adjusted Total Alive at Conclusion of Trial	6	0	7	13
Number Dead with Warfarin Implicated**	0	14	8	22
Percent of Adjusted Total Dead with Warfarin Implicated	0.0%	100.0%	53.3%	

\*These animals variously lost their radios, were shot, or died of other causes.

\*\*The total for T2 includes one hog shot by a hunter who reported the presence of blue dye in the animal.

\*Pages 99-100 Inert ingredient information may be entitled to confidential treatment\*

\*Pages 99-100 Manufacturing process information may be entitled to confidential treatment\*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

**DP BARCODE No.:** D431103; **FILE SYMBOL No.:** 72500-EA (screen); **PRODUCT NAME:** Kaput Hog-Gone;  
**DECISION No.:** 510475; **PC Code(s):** 086002; **ACTION CODE:** R230; **FOOD Use:** No

**DATE OUT:** February 12, 2016

**SUBJECT:** 45/90 day screen results for end use product "Kaput Hog-Gone"

**FROM:** Shyam Mathur,  
Product Chemistry Team Leader  
CITAB / RD (7505P)

**TO:** William Jacobs / Mark Suarez, RM 07  
I-V Branch 3 / RD (7505P)

**Company Name:** Scimetrix Ltd., Corporation  
**Active Ingredient(s):** Warfarin (0.005%)

**MRID No(s):** 49314001 to 49314002

**CONCLUSION:**

**Deficiencies:** No

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc).

**Group A:** All required Data submitted

**Group B:** All required data submitted

**CSF:** Basic CSF (Dated 10-21-2015).

**Draft Product Label:** Submitted.

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of this report the corrected deficiencies in response to 10 day letter. The corrected information will be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

## Jacobs, William

---

**From:** Mathur, Shyam  
**Sent:** Friday, February 12, 2016 8:28 AM  
**To:** Jacobs, William; Suarez, Mark  
**Cc:** Shah, Pv  
**Subject:** 45/90 day screen for 72500-EA  
**Attachments:** 72500-EA(Screen).doc

Shyam Mathur, Ph. D  
Product Chemistry Team Leader  
Chemistry, Inert & Toxicology Assessment Branch (CITAB)/RD (7505P)  
OCSPP/Environmental Protection Agency, USA  
Tel: 703-308-9374  
mathur.shyam@epa.gov

**Jacobs, William**

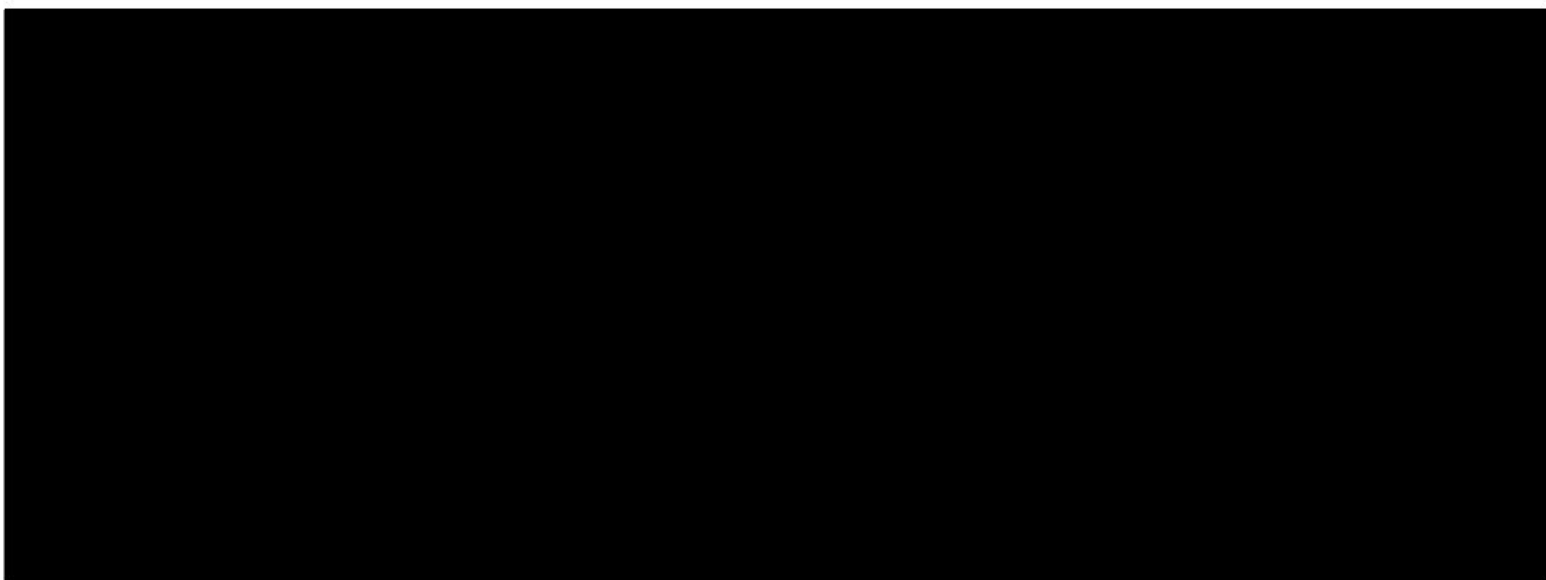
---

**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Tuesday, January 12, 2016 4:54 PM  
**To:** Jacobs, William  
**Cc:** richard@genesislabs.com  
**Subject:** Kaput Hog-Gone with [REDACTED]

**Re: Kaput HOG-GONE, EPA Symbol 72500-EA**  
**Alternate Formulation CSF including** [REDACTED]

Bill:

In regards to your request for more information about the addition of [REDACTED] on the Alternate Formulation CSF for above listed submission:



Bill, if you need copies of the study, CSF's or batch records, please let me know. Any comments or suggestions, let me know as well. Thanks, Sue.

--  
Sue Valentine  
Scimetrics Ltd. Corp.  
PO Box 1045  
Wellington, CO 80549  
Ph. 970-482-1330

# DATA PACKAGE BEAN SHEET

Date: 12-Jan-2016

Page 1 of 2

Decision #: 510475

DP #: (431101)

PRIA

Parent DP #:

Submission #: 976028

E-Sub #: 8829

## \*\*\* Registration Information \*\*\*

### Registration: 72500-EA - Kaput HOG-GONE

Company: 72500 - SCIMETRICS, LTD. CORPORATION

Risk Manager: RM 07 - Mark Suarez - (703) 305-0120 Room# PY1 S-9722

Risk Manager Reviewer: William Jacobs BJACOBS

Sent Date:

PRIA Due Date: 13-Feb-2017

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R230) NEW USE;OUTDOOR;NON-FOOD;

Ingredients: 086002, Warfarin(.005%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 12-Jan-2016

Due Back:

DP Ingredient: 086002, Warfarin

DP Title:

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: EFED / ERB6

Last Possible Science Due Date: 17-Aug-2016

Team Name:

Science Due Date:

Reviewer Name:

Sub Data Package Due Date:

Contractor Name:

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

Please review the proposed label and cited ecological effects studies as well as the ecological effects information in the final report (MRID# 497444-01) for 72500-EUP-2 which summarizes field efficacy trials for baits of composition similar to that proposed for registration as a 0.005% Warfarin bait block.

DP#: (431101)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (510475)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
44820001		Mach, J. (1998) Secondary Hazard Study Using Warfarin-Killed Prairie Dogs ( <i>Cynomys ludovicianus</i> ) Fed to Domestic Ferrets ( <i>Mustela putorius furo</i> ): Lab Project Number: 96013. Unpublished study prepared by Genesis Laboratories, Inc. 64 p.	850.2500/Field testing for terrestrial wildlife	Pass (20-Aug-2010)
44995003		Mach, J.; Carlet, L. (1997) Secondary Hazard Study Using Warfarin-Killed Black-Tailed Prairie Dogs ( <i>Cynomys ludovicianus</i> ) Fed to Domestic Ferrets ( <i>Mustela putorius furo</i> ): Lab Project Number: N97001. Unpublished study prepared by Genesis Laboratories, Inc. 18 p.	850.2500/Field testing for terrestrial wildlife	Pass (21-Aug-2010)
44995004		Mach, J.; March, K. (1997) Secondary Hazard Study Using Warfarin-Killed Black-Tailed Prairie Dogs ( <i>Cynomys ludovicianus</i> ) Fed to Black-Billed Magpies ( <i>Pica pica</i> ): Lab Project Number: N97003. Unpublished study prepared by Genesis Laboratories, Inc. 21 p.	850.2500/Field testing for terrestrial wildlife	Pass (21-Aug-2010)
44995007		Poche, R.; Mach, J. (1999) In Press Journal Article Entitled Wildlife Primary and Secondary Toxicity Studies with Warfarin. Unpublished study prepared by Genesis Laboratories, Inc. 25 p.		Pass (21-Aug-2010)
48373008		Poche, D. (2008) Kaput Nutria Bait: Secondary Toxicity Study with American Alligators ( <i>Alligator mississippiensis</i> ) Fed Warfarin Killed Norway Rats ( <i>Rattus norvegicus</i> ). Project Number: N08018. Unpublished study prepared by Genesis Laboratories, Inc. 26 p.	850.2500/Field testing for terrestrial wildlife	Pass (14-Mar-2011)
48528603		Poche, D. (2008) Exposure of Nutria Bait to Mallard Ducks ( <i>Anas platyrhynchos</i> ). Project Number: N08017. Unpublished study prepared by Genesis Laboratories, Inc. 20 p.	850.2500/Field testing for terrestrial wildlife	Pass (07-Apr-2014)
49744401		Franckowiak, G. (2015) Field Efficacy of Kaput Feral Hog Bait for Controlling Feral Hogs ( <i>Sus scrofa</i> ) in Texas: Final Report. Project Number: 15002. Unpublished study prepared by Genesis Laboratories, Inc. 353p.	810.4600/Rodenticides on farms and rangelands	Pass (20-Oct-2015)

**Jacobs, William**

---

**From:** sue@kaputproducts.com on behalf of Sue Valentine <sue@scimetricsltd.com>  
**Sent:** Wednesday, January 13, 2016 1:55 PM  
**To:** Jacobs, William  
**Subject:** 72500- ET Hog-Gone  
**Attachments:** 72500-ET Hog-Gone Basic CSF 10.21.15.pdf

S 97 96 78

Bill:  
See attached. Let me know if you need any other docs. Thanks, Sue.

--  
Sue Valentine  
Scimetrics Ltd. Corp.  
PO Box 1045  
Wellington, CO 80549  
Ph. 970-482-1330

Decision Seq: 510475

Action Code: R230,NEW USE,OUTDOOR,NON-FOOD,450

...

Tentative Start Date: 12-Nov-2015

Tentative Ind: Yes

Start/Stop Clock

FQPA Clock:

Tentative Due Date: 13-Feb-2017

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date: 12-Nov-2015

FFS Original Decision:

...

Negotiated Due Date:

90-Day Due Date: 10-Feb-2016

Registrant Response Due Date:

Predecisional Due Date: 13-Jan-2017

Add to Bundle?

Current Status: PENDING (26-Oct-2015)

Bundle ID:

Decision Status

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

75 Day Letters

45/90 Day Screen

Primary Decisions

Decision Milestone

FFS Negotiated Due Dates

OPP Target Due Date

Decision Comments

Payment

Unmatched Payments

Decision Ownership

Receipts

Data Package

Reduced Risk

Meetings & Milestones

FFS Information

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S:976027		72500-EA	13-Feb-2017	PENDING
NA				
S:976028	Jacobs, William	72500-EA	13-Feb-2017	PENDING
New use to control/kill feral hogs - pc submitted, previously conducted efficacy data listed as well as submitting a field efficacy study and acute tox waived by RED.				
<div> <div></div> <div>III</div> <div></div> </div>				

Viewing Record 1 of 1

Ball

# Completion of 21-Day Content Screen

PM- 7

EPA Reg. # (File Symbol) 72500- EA

Decision # D

Data package delivered to  
you on 11/5/15.  
(date)

Jacket/Mini-jacket will be  
transferred to you today.  
(Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

**Memorandum E-SUBMISSION**Date: 11/3/15To: PM 07, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

October 28, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

SCIMETRICS, LTD. CORPORATION  
PO.BOX : 1045  
WELLINGTON, CO 80549-1045

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 22-OCT-15. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



October 21, 2015

Mr. Mark Suarez, Product Manager 7  
 Document Processing Desk - **REGFEE**  
 Office of Pesticide Programs – **7504P**  
**U.S. Environmental Protection Agency**  
 One Potomac Yard, Room S-4900  
 2777 South Crystal Drive  
 Arlington, VA 22202

Dear Mr. Suarez:

**Subject:** Kaput® HOG-GONE  
 EPA File Symbol 72500-\_\_

The following documents on the attached CD are submitted in support of subject's product FIFRA Section (3)(c) pesticide product registration:

**Volume 1 of 2: Administrative Documents:**

1. Copy of PRIA Fee - Prepayment of \$6,607 (75% waiver applied)
2. Application for Pesticide: **Registration**
3. Voluntary Small Business Certification Form for Pesticide Registration Fee Waiver/Reduction
4. Supporting documentation for Fee Waiver/Reduction
5. Product Chemistry Data Summary
6. Not Applicable Data Requirements Summary
7. Proposed labeling
8. Formulator's Exemption Statement
9. Confidential Statement of Formula – Basic
10. Confidential Statement of Formula - Alternate
11. Certification with Respect to Citation of Data
12. Data Matrix (Agency Internal Use Copy)
13. Data Matrix (Public File Copy)

**Volume 2 of 2: Product Chemistry Data: Assigned MRID Number: 49749101**

Polyakova, L. (2015): Kaput® Feral Hog Bait End-Use Product: Determination of Storage Stability and Corrosion Characteristics. Unpublished study report prepared by Genesis Laboratories, Inc., Wellington CO . 34p. OCSPP Guideline Numbers 830.6317 and 830.6320.

Per the Data Matrix, with the exception of the Volume 2 data, we are citing previously-submitted product chemistry and product performance data to support this product's registration. Acute toxicity studies were waived per the Agency's Warfarin Reregistration Eligibility Decision (RED).

*Continued...*



PO Box 1045 • Wellington, Colorado 80549-1045  
 970-482-1330 Phone • 970-482-1885 Fax  
[www.kaputproducts.com](http://www.kaputproducts.com)

We would like to point out to the Agency that the latest field study "Field Efficacy of Kaput Feral Hog Bait for Controlling Feral Hogs (*Sus scrofa*) in Texas" (MRID49744401) proved very effective with a low concentration of 0.005% warfarin. This is 1/5 the concentration of EPA approved rat and mouse products containing 0.025% warfarin. In addition, warfarin has the shortest half-life of all the anticoagulants used in the U.S. Low concentration and short half-life lowers the risk for primary and secondary poisoning of non-target animals. Studies previously submitted to the Agency substantiate this fact:

MRID 44820001 "Secondary hazard study using warfarin-killed prairie dogs (*Cynomys ludovicianus*) fed to domestic ferrets" using 0.05% warfarin resulted in no effects.

MRID 48373008 "Secondary toxicity study with American alligators fed warfarin-killed rats" resulted in no effects using 0.025% warfarin.

MRID 48528603 "Exposure of Nutria Bait to Mallard Ducks (*Anas platyrhynchos*)" containing 0.025% warfarin showed low palatability and no effects.

MRID 44995003 "Secondary hazard study using warfarin-killed black-tailed prairie dogs fed to domestic ferrets" resulted in no effects using 0.05% warfarin.

MRID 44995004 "Secondary hazard study using warfarin-killed laboratory rats fed to black-billed magpies" showed no effects using 0.05% warfarin.

MRID 44995007 "Wildlife primary and secondary toxicity studies with warfarin"

An additional safety feature is the blue dye contained in the product: it colors the fatty tissue of the animal blue. The blue color is an instant indicator to any individual (hunter or non-hunter) not to consume the meat.

Feral Hogs are becoming an ever increasing problem throughout the United States. They cause tremendous destruction to the environment, including the destruction of endangered species and their habitat. Feral Hogs will feed on almost any agricultural crop, and cause significant financial losses to producers due to crop losses and property damage. These pests carry a variety of parasitic and infectious diseases that easily can spread to other wildlife, livestock and humans. Kaput HOG-GONE is a low-risk bait that will help control feral hog population.

Please contact me at (970) 482-1330 or [sue@scimetrixltd.com](mailto:sue@scimetrixltd.com) if you have any questions or require additional information, including fee waiver/reduction information.

Sincerely,



Sue Valentine,  
Regulatory Manager

Attachment (CD)



October 21, 2015

Mr. Mark Suarez, Product Manager 7  
 Document Processing Desk - **REGFEE**  
 Office of Pesticide Programs – **7504P**  
**U.S. Environmental Protection Agency**  
 One Potomac Yard, Room S-4900  
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*Continued . . .*



PO Box 1045 • Wellington, Colorado 80549-1045  
 970-482-1330 Phone • 970-482-1885 Fax  
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Please contact me at (970) 482-1330 or [sue@scimetricsltd.com](mailto:sue@scimetricsltd.com) if you have any questions or require additional information, including fee waiver/reduction information.

Sincerely,



Sue Valentine,  
Regulatory Manager

Attachment (CD)

**21-Day Screen Completed by**  
**Contractor**

**21-Day Expires on** 11-12-15

**Jacket #** 72500-EA

**MRID#** 497491

**Content Screen:** Recommend to Pass/Fail

**11-3 Review:** Pass/Fail/NA

**Overall Status:** Recommend to Pass/Fail

**Transfer This Jacket to:**

STEPHEN SCHAIBLE

# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 10-22-15

Experts In-Processing Signature: B.B. Date 10-27-15 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date \_\_\_\_\_

EPA Reg. Number: <u>72500-EA</u>		EPA Receipt Date: <u>10-22-15</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

**Comments:**

Documentation: Pass

- Required forms are complete.

Inerts: Pass

- Inerts approved for non-food use.

11-3: Pass

- MRID - 497491

5+9+45: Pass

TO 11/3/15

\* N/A – Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### **Conventional New Product Applications**

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 26, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-510475  
EPA File Symbol or Registration Number: 72500-EA  
Product Name: Kaput HOG-GONE  
EPA Receipt Date: 22-Oct-2015  
EPA Company Number: 72500  
Company Name: SCIMETRICS, LTD. CORPORATION

SUE VALENTINE  
SCIMETRICS, LTD. CORPORATION  
PO Box 1045  
WELLINGTON, CO 80549-1045

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R230

NEW USE;OUTDOOR;NON-FOOD;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Downs".

Front End Processing Staff

Information Technology & Resources Management Division

**Fee for Service**

{97602<sup>7</sup>~~7~~~

This package includes the following

☒ New Registration

☐ Amendment

☐ Studies? ☒ Fee Waiver?

☐ volpay % Reduction: 75

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

7

Receipt No.

S-

97602<sup>7</sup>~~7~~

EPA File Symbol/Reg. No.

72500-EA

Pin-Punch Date:

10/22/2015

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R230

Granted:

R230

Amount Due: \$ 26,427<sup>00</sup>

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Kmmunty

Date: 10/26/15

Remarks:

Sim clinic needed

**e-Submission**

**Receipt for Section 3**

S: 976028 Milestone Email: sue@scimetrics.com

Regulatory Type: Product Registration - Section 3 Resubmission: ☒ Yes ☐ No

Application Type: New Registration Fee For Service: ☐ Yes ☒ No

Company: 72500 SCIMETRICS, LTD. CORPORATION Billable: ☐ Yes ☒ No

Risk Manager: Registration Division, Risk Management Team 7

Product #: 72500-EA Product Name: Kaput HOG-GONE

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 14-Jan-2015 OPP Rec'd Date: 22-Oct-2015

Front End Date: 23-Oct-2015 Risk Manager Send Date:

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description: associated with e-Submission pkg 8829; new application

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

Receipt Content

Study	
CSF	

View/Edit

Print Letter

Enter More Information

Tracking

e-Submission

Receipt for Section 3

S: 976027

Milestone Email: sue@scimetricsltd.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 72500 SCIMETRICS, LTD. CORPORATION



Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 7

Product #: 72500-EA Product Name: Kaput HOG-GONE

Override#:

Me Too  
Section3

Me Too Product  
Name:

Application Date: 21-Oct-2015



OPP Rec'd Date: 22-Oct-2015



Front End Date: 23-Oct-2015



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

e-Submission pkg 8826. Application for registration

Receipt Content

Study

CSF

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

e-Submission


[Log in](#) | [Register](#)

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Search

MAKE A PAYMENT

FIND AN AGENCY

ONLINE HELP

For security reasons, if you are using Pay.gov on a shared computer, make sure you close your browser window after you complete your payment.

## Payment Confirmation - Pesticide Registration Improvement Act - Prepayment

[Before You Begin](#) | [1 Complete Agency Form](#) | [2 Enter Payment Info](#) | [3 Review & Submit](#) | [Confirmation](#)

### Payment Confirmation

Your payment is complete

Pay.gov Tracking ID: 2500MR5C

Agency Tracking ID: 74894406267

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

#### Payment Information

Payment Type: Bank account (ACH)

Payment Amount: \$6,607.00

Transaction Date: 10/20/2015 05:51:59 PM EDT

Payment Date: 10/21/2015

Registration Number:

Company Name: Scimetrix Ltd. Corp.

Company Number: 72500

Action Code: R230

#### Account Information

Account Holder Name: Scimetrix Ltd. Corp.

Routing Number: [REDACTED]

Account Number: \*\*\*\*\*4259

#### Email Confirmation Receipt

Confirmation Receipts have been emailed to:

sue@scimetrixltd.com

[Print Receipt](#)

Register today!

Thank you for your payment! Please consider registering for a Pay.gov account today. Having a Pay.gov account provides you the ability to:

- ▶ Manage your payments
- ▶ See your payment history
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- ▶ See your form and bill history
- ▶ Store payment account data which speeds up the payment process
- ▶ Create recurring transactions if your agency supports it

If you would like to register today, please click the Register for a Pay.gov account button below. Note: If you register within 30 minutes, you will see this payment in your payment history.

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### Need Help?

PRIA Service Fees



Contact: Michael Yanchulis

Email: [Click to email](#)

Phone: (703) 347-0237

### WARNING WARNING WARNING

You have accessed a United States Government computer. Unauthorized use of this computer is a violation of federal law and may subject you to civil and criminal penalties. This computer and the automated systems which run on it are monitored. Individuals are not guaranteed privacy while using government computers and should, therefore, not expect it. Communications made using this system may be disclosed as allowed by federal law.

Note: This system may contain Sensitive But Unclassified (SBU) data that requires specific data privacy handling.

### CUSTOMER SERVICE


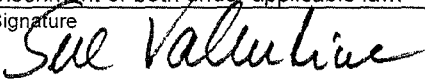
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Pay.gov Customer Service:  
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# e-Submission 125

	United States <b>Environmental Protection Agency</b> 401 M Street, S.W. Washington, DC 20460-0001	<input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> <b>Other</b>	OPP Identifier Number <b>D-_____</b>
	<b>Application for Pesticide – Section I</b>		
1. Company/Product Number <b>EPA File Symbol 72500-_____</b>		2. EPA Product Manager <b>Mark Suarez</b>	
4. Company/ Product (Name) <b>Kaput® HOG-GONE</b>		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) <b>Scimetrics Ltd. Corp.</b> <b>PO Box 1045</b> <b>Wellington CO 80549</b> <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to:  EPA Reg. No. _____ Product Name: _____	
<b>Section – II</b>			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.	
<b>Explanation:</b> Use additional page(s) if necessary. (For Section I and Section II.)  <b>PRIA New Product Application</b>  <b>PRIA Category: R230 (15 months review time, Regular Fee \$25,168, Paid Fee \$6,607 due to 75% fee waiver/reduction)</b>			
<b>Section – III</b>			
1. <b>Material This Product Will Be Packaged In:</b>			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
<b>*Certification must be submitted</b>		If "Yes" Unit Packaging Wgt.    No. Per Container	If "Yes" Packaging Wgt.    No. Per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <b>25 to 100 lbs.</b>	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Other ___ Self-adhesive; printed ___			
<b>Section - IV</b>			
1. <b>Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).</b>			
Name Sue Valentine		Title Regulatory Manager	
		Telephone No. (Include Area Code) 970-482-1330	
<b>Certification</b>			6. Date Application Received <b>(Stamped)</b>
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Regulatory Manager	
4. Typed Name Sue Valentine		5. Date October 21, 2015	



October 21, 2015

Mr. Mark Suarez, Product Manager 7  
Document Processing Desk - **REGFEE**  
Office of Pesticide Programs – **7504P**  
**U.S. Environmental Protection Agency**  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, VA 22202

Dear Mr. Suarez:

**Subject:** Kaput® HOG-GONE  
EPA File Symbol 72500-\_\_

The following documents on the attached CD are submitted in support of subject's product FIFRA Section (3)(c) pesticide product registration:

**Volume 1 of 2: Administrative Documents:**

- ✓1. Copy of PRIA Fee - Prepayment of \$6,607 (75% waiver applied)
- ✓2. Application for Pesticide: **Registration**
- ✓3. Voluntary Small Business Certification Form for Pesticide Registration Fee Waiver/Reduction
- ✓4. Supporting documentation for Fee Waiver/Reduction
- ✓5. Product Chemistry Data Summary
- ✓6. Not Applicable Data Requirements Summary
- ✓7. Proposed labeling
- ✓8. Formulator's Exemption Statement
- ✓9. Confidential Statement of Formula – Basic
- ✓10. Confidential Statement of Formula - Alternate
- ✓11. Certification with Respect to Citation of Data
- ✓12. Data Matrix (Agency Internal Use Copy)
- ✓13. Data Matrix (Public File Copy)

**Volume 2 of 2: Product Chemistry Data: Assigned MRID Number: 49749101**

Polyakova, L. (2015): Kaput® Feral Hog Bait End-Use Product: Determination of Storage Stability and Corrosion Characteristics. Unpublished study report prepared by Genesis Laboratories, Inc., Wellington CO . 34p. OCSPP Guideline Numbers 830.6317 and 830.6320. 34

Per the Data Matrix, with the exception of the Volume 2 data, we are citing previously-submitted product chemistry and product performance data to support this product's registration. Acute toxicity studies were waived per the Agency's Warfarin Reregistration Eligibility Decision (RED).

*Continued...*



PO Box 1045 • Wellington, Colorado 80549-1045  
970-482-1330 Phone • 970-482-1885 Fax  
[www.kaputproducts.com](http://www.kaputproducts.com)

**Submission**

We would like to point out to the Agency that the latest field study “Field Efficacy of Kaput Feral Hog Bait for Controlling Feral Hogs (*Sus scrofa*) in Texas” (MRID49744401) proved very effective with a low concentration of 0.005% warfarin. This is 1/5 the concentration of EPA approved rat and mouse products containing 0.025% warfarin. In addition, warfarin has the shortest half-life of all the anticoagulants used in the U.S. Low concentration and short half-life lowers the risk for primary and secondary poisoning of non-target animals. Studies previously submitted to the Agency substantiate this fact:

MRID 44820001 “Secondary hazard study using warfarin-killed prairie dogs (*Cynomys ludovicianus*) fed to domestic ferrets” using 0.05% warfarin resulted in no effects.

MRID 48373008 “Secondary toxicity study with American alligators fed warfarin-killed rats” resulted in no effects using 0.025% warfarin.

MRID 48528603 “Exposure of Nutria Bait to Mallard Ducks (*Anas platyrhynchos*)” containing 0.025% warfarin showed low palatability and no effects.

MRID 44995003 “Secondary hazard study using warfarin-killed black-tailed prairie dogs fed to domestic ferrets” resulted in no effects using 0.05% warfarin.

MRID 44995004 “Secondary hazard study using warfarin-killed laboratory rats fed to black-billed magpies” showed no effects using 0.05% warfarin.

MRID 44995007 “Wildlife primary and secondary toxicity studies with warfarin”

An additional safety feature is the blue dye contained in the product: it colors the fatty tissue of the animal blue. The blue color is an instant indicator to any individual (hunter or non-hunter) not to consume the meat.

Feral Hogs are becoming an ever increasing problem throughout the United States. They cause tremendous destruction to the environment, including the destruction of endangered species and their habitat. Feral Hogs will feed on almost any agricultural crop, and cause significant financial losses to producers due to crop losses and property damage. These pests carry a variety of parasitic and infectious diseases that easily can spread to other wildlife, livestock and humans. Kaput HOG-GONE is a low-risk bait that will help control feral hog population.

Please contact me at (970) 482-1330 or [sue@scimetricsltd.com](mailto:sue@scimetricsltd.com) if you have any questions or require additional information, including fee waiver/reduction information.

Sincerely,



Sue Valentine,  
Regulatory Manager

Attachment (CD)

**EPA**

United States  
**Environmental Protection Agency**  
 Washington, DC 20460

**Formulator's Exemption Statement**  
 (40 CFR § 152.85 and § 158.50)

<b>Applicant's Name and Address:</b>  <b>Scimetrix Ltd. Corporation</b> <b>P.O. Box 1045</b> <b>Wellington, CO 80549</b>	<b>EPA File Symbol/Registration Number:</b> <b>72500-</b>
	<b>Product Name:</b> <b>Kaput® HOG-GONE</b>
	<b>Date of Confidential Statement of Formula (EPA Form 8570-4):</b> <b>October 21, 2015</b>

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

**Warfarin 0.005%**


- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR § 158.50(e)(2) or (3).

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☒ (A) An accurate Confidential Statement of Formula (CSF) (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number and product name the source of the active ingredient(s) listed in paragraph (1).
- ☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, is accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the Formulator's Exemption:

Active Ingredient(s)	Source Product Name(s)	Registration Number(s)
<b>Warfarin</b>		

<b>Signature</b> 	<b>Name and Title</b> <b>Sue Valentine</b> <b>Regulatory Manager</b>	<b>Date</b> <b>October 21, 2015</b>
---	--	--

EPA Form 8570-27 (Rev. 06-2004)

\*Product ingredient source information may be entitled to confidential treatment\*

**e-Submission**



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

## Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number <b>Scimetrics Ltd. Corporation</b> <b>PO Box 1045</b> <b>Wellington CO 80549</b> <b>(970) 482-1330</b> <b>(970) 482-1885 (fax)</b> <b>sue@scimetricsltd.com</b>	EPA Registration Number/File Symbol  <b>72500-__</b>
Active Ingredient(s) and/or Representative Test Compound(s)  <b>0.005% Warfarin</b>	Date  <b>October 21, 2015</b>
General Use Pattern(s) [list all those claimed for this product using 40 CFR Part 158]  <b>Non-Food, Outdoor</b>	Product Name  <b>Kaput® HOG-GONE</b>

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice and have included with this form a list of companies sent offer of compensation (the Data Matrix form should be used for this purpose)

### Section I: Method of Data Support

(Check only one method)

☐ I am using the cite-all method of support and have included with this form a list of companies sent offer of compensation (the Data Matrix form should be used for this purpose). ☒ I am using the selective method of support (or cite-all option under the selective method) and have included with this form a completed list of data requirements (the Data Matrix form must be used).

### Section II: General Offer-to-Pay

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation to other persons with regard to the approval of this application to the extent required by FIFRA.

### Section III: Certification

I hereby certify that this application for registration, this form for reregistration or this Data Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration or the Data Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered: (i) to pay compensation to the extent required by Sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with Sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Sue Valentine</i>	Date <b>October 21, 2015</b>	Typed or Printed Name and Title <b>Sue Valentine, Registration Specialist</b>
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

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## Data Matrix

Date: 10/21/2015	EPA Reg. No./File Symbol: 72500-	Page 1 of 2
Applicant's/Registrant's Name and Address: Scimetrix Ltd. Corporation PO Box 1045 Wellington, CO 80549-1045		Product Name: <b>Kaput® HOG-GONE</b>
Ingredient(s): 0.005% Warfarin (CAS Number 81-81-2)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
830.1550	Product identity and composition	493140-01	Scimetrix Ltd. Corporation	OWN	
830.1600	Description of materials used to produce the product	493140-01	Scimetrix Ltd. Corporation	OWN	
830.1650	Description of formulation process	493140-01	Scimetrix Ltd. Corporation	OWN	
830.1670	Discussion of formulation of impurities	493140-01	Scimetrix Ltd. Corporation	OWN	
830.1750	Certified limits	493140-01	Scimetrix Ltd. Corporation	OWN	
830.1800	Enforcement analytical method	493140-01	Scimetrix Ltd. Corporation	OWN	
830.6302	Color	493140-02	Scimetrix Ltd. Corporation	OWN	
830.6303	Physical state	493140-02	Scimetrix Ltd. Corporation	OWN	
830.6304	Odor	493140-02	Scimetrix Ltd. Corporation	OWN	
830.6317	Storage stability		Scimetrix Ltd. Corporation	OWN	
830.6320	Corrosion characteristics		Scimetrix Ltd. Corporation	OWN	
830.7000	pH	493140-02	Scimetrix Ltd. Corporation	OWN	
830.7300	Density/relative density/bulk density	493140-02	Scimetrix Ltd. Corporation	OWN	
850.2500	Secondary hazard study using warfarin-killed prairie dogs fed to domestic ferrets	448200-01	Scimetrix Ltd. Corporation	OWN	
850.2500	Secondary hazard study using warfarin-killed black-tailed prairie dogs fed to domestic ferrets	449950-03	Scimetrix Ltd. Corporation	OWN	
850.2500	Secondary hazard study using warfarin-killed black-tailed prairie dogs fed to black-billed magpies	449950-04	Scimetrix Ltd. Corporation	OWN	
850.2500	Secondary toxicity study with American alligators fed warfarin-killed Norway rats	483730-08	Scimetrix Ltd. Corporation	OWN	
850.2500	Exposure of Nutria Bait to Mallard Ducks	485286-03	Scimetrix Ltd. Corporation	OWN	
96-12	Field Efficacy for Controlling Feral Hogs	497444-01	Scimetrix Ltd. Corporation	OWN	

Signature: <i>Sue Valentine</i>	Name and Title: Sue Valentine, Regulatory Manager	Date: 10/21/2015
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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue, N.W.

Washington, DC 20460

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## Data Matrix

Date: 10/21/2015

EPA Reg. No./File Symbol: 72500-

Page 1 of 2

Applicant's/Registrant's Name and Address: Scimetrix Ltd. Corporation  
PO Box 1045  
Wellington, CO 80549-1045

Product Name:

Kaput® HOG-GONE

Ingredient(s): 0.005% Warfarin (CAS Number 81-81-2)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
			Scimetrix Ltd. Corporation	OWN	
			Scimetrix Ltd. Corporation	OWN	
			Scimetrix Ltd. Corporation	OWN	
			Scimetrix Ltd. Corporation	OWN	
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			Scimetrix Ltd. Corporation	OWN	
			Scimetrix Ltd. Corporation	OWN	
			Scimetrix Ltd. Corporation	OWN	

Signature:

Name and Title:

Sue Valentine, Regulatory Manager

Date:

10/21/2015

**Kaput**

## HOG-GONE

**Active Ingredient:**

Warfarin (CAS Number 81-81-2) ..... 0.005%

**Other Ingredients** ..... 99.995%

**Total** ..... 100.000%

**Keep Out of Reach of Children**

### CAUTION

See back [side] panel for First Aid and additional Precautionary Statements.

EPA Reg. No. 72500-\_\_

EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs

{25 to 100 lbs}

{11.34 to 45.36 kg}

{Back [Side] Panel}

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THIS LABEL:**

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label.
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may be used to control only feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands.

- Do not apply this bait on the ground.
- Use a commercially available hog feeder with a heavy lid (approximately 8-10 lbs. total lid weight) to prevent non-target animals from accessing the bait.
- Apply bait in fenced areas if available.
- Wear protective gloves when handling bait or animal carcasses.
- Store this product out of reach of children and away from humans, domesticated animals, pets and wildlife.
- Do not allow young children, pets, domesticated animals or persons not associated with the application to be in areas where the bait is being applied.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers.

**e-Submission**

#### **TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian at once.

*- is this all?*

#### **NOTE TO PHYSICIAN OR VETERINARIAN**

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K1 intramuscularly or orally.

#### **ENVIRONMENTAL HAZARDS**

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

*bot  
1<sup>st</sup>  
Au)*

#### **ENDANGERED SPECIES PROTECTION REQUIREMENTS**

This product may have effects on endangered species. When using this product you must follow the measures contained in the Endangered Species Protection Bulletin for the county I which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

#### **WARRANTY**

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

#### **[WARRANTY DISCLAIMER**

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

#### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER



## Summary Product Chemistry Data

**Kaput<sup>®</sup>**

HOG-GONE

EPA File Symbol 72500-\_\_

October 21, 2015

**Kaput<sup>®</sup> HOG-GONE, EPA File Symbol 72500-\_\_** is an end-use formulated wax bait product containing 0.005% Warfarin as the sole active ingredient. The formulation process is not an integrated process. No impurities are expected to be present in the product, as marketed, at a level equal to or greater than 0.1%, based on the applicants/registrants knowledge of the ingredients, formulation or packaging.

The product has the following applicable physical/chemical characteristics:

Data Requirement	Test Description	Results	
830.6302	Color	Blue (5PB 3-4/4-8)	
830.6303	Physical State	Solid @ 20.4°C	
830.6304	Odor	Medium intensity fermented grain-like	
830.6317	Storage Stability	<b>Analysis</b>	<b>Warfarin</b>
		Initial	0.0052%
		3 months	0.0052%
		6 months	0.0051%
		9 months	0.0048%
		12 months	0.0054%
830.6320	Corrosion Characteristics	The test substance sample was stored at ambient conditions for one year. Under these conditions, the test substance and its containers exhibited no evidence of corrosion.	
830.7000	pH	5.4 @ 20.3°C	
830.7300	Bulk Density	36.45 pounds/cubic foot @ 21°C (0.584 g/ml)	

Sources: MRID Number 493140-01 (Product Identity data volume), MRID Number 493140-02 (physical and chemical characteristics data volume) and MRID Number \_\_\_\_\_ (one-year storage stability with corrosion characteristics data volume).



## Not Applicable Data Requirements

**Kaput**

HOG-GONE

EPA File Symbol 72500-  
October 21, 2015

The following data requirements are not applicable to this product:

Data Requirement	Test Description	Reason Requirement is Not Applicable
830.1620	Description of production process	Not an integrated production process
830.1700	Preliminary process	Not an integrated production process
830.1900	Submittal of samples	Will be submitted upon Agency request
830.6313	Stability	Product in an end-use product
830.6314	Oxidation/reduction	Product does not contain redox agents
830.6315	Flammability	Product is not a combustible liquid or aerosol
830.6316	Explodability	Product is not potentially explosive
830.6319	Miscibility	Product is not an emulsifiable liquid to be diluted with petroleum solvent
830.6321	Dielectric breakdown voltage	Product is not a liquid for use around electrical equipment
830.7050	UV/visible light absorption	Product is an end-use product
830.7100	Viscosity	Product is not a liquid
830.7200	Melting point/range	Product is an end-use product
830.7220	Boiling point/range	Product is an end-use product
830.7370	Dissociation constants in water	Product is an end-use product
830.7520	Particle size, fiber length, diameter distribution	Product is not water insoluble or fibrous
830.7550 830.7560 830.7570	Partition coefficient	Product is an end-use product
830.7840 830.7860	Water solubility	Product is an end-use product
830.7950	Vapor pressure	Product is an end-use product
870.1100	Acute oral toxicity	Waived per the May 1991 Warfarin RED
870.1200	Acute dermal toxicity	Waived per the May 1991 Warfarin RED
870.1300	Acute inhalation toxicity	Waived per the May 1991 Warfarin RED
870.2400	Primary eye irritation	Waived per the May 1991 Warfarin RED
870.2500	Primary dermal irritation	Waived per the May 1991 Warfarin RED
870.2600	Dermal sensitization	Waived per the May 1991 Warfarin RED

**e-Submission**

**Kaput**

## HOG-GONE

**Active Ingredient:**

Warfarin (CAS Number 81-81-2) ..... 0.005%

**Other Ingredients** ..... 99.995%

Total ..... 100.000%

**Keep Out of Reach of Children**

### CAUTION

**See back [side] panel for First Aid and additional Precautionary Statements.**

EPA Reg. No. 72500-  
EPA Est. 72500-CO-1

Net Wt. \_\_\_\_ lbs  
{25 to 100 lbs}  
[{11.34 to 45.36 kg}]

*(Back [Side] Panel)*

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THIS LABEL:**

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label.
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may be used to control only feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands.

- Do not apply this bait on the ground.
- Use a commercially available hog feeder with a heavy lid (approximately 8-10 lbs. total lid weight) to prevent non-target animals from accessing the bait.
- Apply bait in fenced areas if available.
- Wear protective gloves when handling bait or animal carcasses.
- Store this product out of reach of children and away from humans, domesticated animals, pets and wildlife.
- Do not allow young children, pets, domesticated animals or persons not associated with the application to be in areas where the bait is being applied.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (fenced or open) during the baiting program and for at least 90 days after toxic baits are removed from bait dispensers.

**SITE ASSESSMENT:** Before applying this product, observe the area to identify where feral hog activity and trails are evident. Look for damaged crops, rutting of the soil and tracks to ensure activity in the area.

**BAIT APPLICATION:** To kill feral hogs, put 25-50 pounds of bait into each feeder, depending upon hog density. Place three feeders in a cluster, approximately 10 feet apart. Place one cluster per 200 acres. Position feeders in scrub or wooded areas where hogs frequent during the day. Avoid placing feeders in open crops, fields or pastures. Secure feeders to the ground in their up-right position with stakes and or T-posts. The animal access door must be closed to limit access to only feral hogs. Continue treatment for 10-21 days. Monitor feeders every 1-5 days, preferably in the early morning. Refill feeders if bait is significantly depleted or degraded and there is still evidence of hog activity at the feeder. **Leave no bait on soil surface or outside the feeder.** Collect and properly dispose of all bait that has spilled outside the feeder. After treatment, collect and properly dispose of any bait that has fallen out of the feeder.

**SURVEILLANCE AND FOLLOW-UP:** Dead feral hogs may begin to appear in or near the treatment areas within 4-7 days after bait placement. Applicators must return to the treatment site within 4 days of application, and at 2- to 5-day intervals thereafter, to inspect each feeder and to collect and properly dispose of any bait found on the surface or dead/dying feral hogs. All carcasses found must be collected and properly disposed. Bury carcasses on site in holes dug deep enough that the entire carcass is at least 18 inches below ground level. Cover carcasses with earth up to the level of the surrounding ground. If burial is not practical (due to frozen ground, etc.) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by other methods to ensure that carcasses are inaccessible to scavengers. Continue to collect and dispose of feral hogs and search for non-target animals for at least two weeks after the last filling of the bait feeder boxes. Deaths of any animals other than feral hogs that appear to be the result of baiting must be reported to state authorities.

**Note:** Blue dye in this product will color the fatty tissue of the feral hog blue as an indicator that animal has consumed the bait.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Offer for recycling, if available, or reconditioning, if appropriate; otherwise, dispose of empty container in a sanitary landfill.

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

#### PRECAUTIONARY STATEMENTS

##### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

#### FIRST AID

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

**If swallowed,** immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If in eyes,** hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

#### **TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian at once.

#### **NOTE TO PHYSICIAN OR VETERINARIAN**

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally.

#### **ENVIRONMENTAL HAZARDS**

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

#### **ENDANGERED SPECIES PROTECTION REQUIREMENTS**

This product may have effects on endangered species. When using this product you must follow the measures contained in the Endangered Species Protection Bulletin for the county I which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

#### **WARRANTY**

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

#### **[WARRANTY DISCLAIMER**

**The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.**

#### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER

BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

**If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded.**  
*By using the goods, you expressly agree to all of the terms and conditions of this contract.]*

[Attention [Notice]: This product contains a chemical known to the state of California to cause birth defects or other reproductive harm.]

Manufactured by:



**[Pest Management Solutions]**

P.O. Box 1045

Wellington, CO 80549

(970) 482-1330

[customerservice@kaputproducts.com](mailto:customerservice@kaputproducts.com)

Made in the U.S.A.

[Kaput® is a registered trademark of Scimetrix Ltd. Corporation]

{ } Denotes language that does not appear on the market label

[ ] Denotes alternate/optional language





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: D431103; FILE SYMBOL No.: 72500-EA (screen); PRODUCT NAME: Kaput Hog-Gone;  
DECISION No.: 510475; PC Code(s): 086002; ACTION CODE: R230; FOOD Use: No

DATE OUT: February 12, 2016

SUBJECT: 45/90 day screen results for end use product "Kaput Hog-Gone"

FROM: Shyam Mathur,  
Product Chemistry Team Leader  
CITAB / RD (7505P)

*SBM*

TO: William Jacobs / Mark Suarez, RM 07  
I-V Branch 3 / RD (7505P)

Company Name: Scimetrix Ltd., Corporation  
Active Ingredient(s): Warfarin (0.005%)

MRID No(s): 49314001 to 49314002

CONCLUSION:

**Deficiencies:** No

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc).

**Group A:** All required Data submitted

**Group B:** All required data submitted

CSF: Basic CSF (Dated 10-21-2015).

*ALL CSF (10-21-15)*

**Draft Product Label:** Submitted.

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of this report the corrected deficiencies in response to 10 day letter. The corrected information will be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.